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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 ANIBAL RODRIGUEZ, et al.,  
11 Plaintiffs,  
12 v.  
13 GOOGLE LLC,  
14 Defendant.

Case No.: 20-cv-04688-RS

**DECLARATION OF CAMERON R. AZARI,  
ESQ. REGARDING IMPLEMENTATION  
AND ADEQUACY OF CLASS NOTICE  
PLAN AND NOTICES**

15 I, Cameron R. Azari, Esq., declare as follows:

16 1. My name is Cameron R. Azari. I understand that this declaration is being submitted  
17 to the Court pursuant to the Court's orders directing notice to members of the certified classes, which  
18 require the class notice administrator to report requests for exclusion and related information  
19 regarding implementation of the Court-approved notice plan. *See* Dkt. 440. I have personal  
20 knowledge of the matters set forth herein, and I believe them to be true and correct.

21 2. The facts in this declaration are based on my personal knowledge, as well as  
22 information provided to me by my colleagues in the ordinary course of my business.

23 3. I am a nationally recognized expert in the field of legal notice, and I have served as an  
24 expert in hundreds of federal and state cases involving class action notice plans.

25 4. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. ("Epiq")  
26 and the Managing Director of Legal Notice (aka Hilsoft Notifications), a business unit of Epiq that  
27 specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal  
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**DECLARATION OF CAMERON R. AZARI, ESQ., REGARDING IMPLEMENTATION AND  
ADEQUACY OF CLASS NOTICE PLAN AND NOTICES**

1 notification plans. Epiq recently rebranded Hilsoft Notifications as Epiq Legal Noticing. Epiq and  
2 Epiq Legal Noticing will hereinafter be referred to as “Epiq.”

3 5. On May 31, 2024, the Court in its *Order Granting Plaintiffs’ Motion to Direct Notice*  
4 *to the Certified Classes* appointed Epiq (“Hilsoft Notifications”) and myself as the class notice  
5 administrator.

6 6. Since then, I and Epiq’s staff working at my direction have successfully carried out  
7 the Court-approved Revised Class Notice Plan. As described herein, this was a massive effort. Epiq  
8 sent more than 369 million Email Notices, of which 93.1% were successfully delivered. Epiq  
9 supplemented the Email Notice effort with a Media Plan that included digital and social media  
10 notices, sponsored search listings, and a case website. Overall, the Class Notice efforts reached well  
11 in excess of 85% of the Class, satisfying standards for due process.

#### 12 **CLASS NOTICE PLAN**

13 7. This declaration describes the successful implementation of the Revised Class Notice  
14 Plan (“Class Notice Plan”) and notices (the “Notice” or “Notices”) for *Rodriguez et al. v. Google*  
15 *LLC.*, Case No. 20-cv-04688, in the United States District Court for the Northern District of  
16 California.

17 8. I previously executed my *Declaration of Cameron R. Azari, Esq. Regarding Proposed*  
18 *Class Notice Plan and Notices* (“Notice Plan Declaration”) on March 7, 2024, which described the  
19 Class Notice Plan, detailed Hilsoft’s class action notice experience, and attached Hilsoft’s *curriculum*  
20 *vitae*. I also provided my educational and professional experience relating to class actions and my  
21 ability to render opinions on overall adequacy of notice programs. Subsequently, I executed my  
22 *Supplemental Declaration of Cameron R. Azari, Esq. Regarding Proposed Class Notice Plan and*  
23 *Notices* (“Supplemental Notice Plan Declaration”) on April 26, 2024, which advised the Court  
24 whether any aspect of the Court’s *Order Granting In Part Motion To “Clarify” Class Definition*  
25 required changes to the previously approved Class Notice Plan, and additionally, identified what  
26 revisions were made to the Notices as a result of Court approved changes to the class definition.

**NOTICE PLANNING METHODOLOGY**

9. Federal Rules of Civil Procedure Rule 23 directs that notice must be “the best notice that is practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort” and “the notice may be by one or more of the following: United States mail, electronic means, or other appropriate means.”<sup>1</sup> The Class Notice Plan as implemented satisfied these requirements.

10. The Class Notice Plan included: (1) direct notice via email to email accounts associated with users who had Web & App Activity (“WAA”) and/or supplemental Web & App Activity (“sWAA”) turned off or “paused” at any time between during the Class Period (defined as any time between July 1, 2016 and September 23, 2024), which resulted in sending hundreds of millions of Email Notices; (2) supplemental notice via a Media Plan that included digital and social media, and sponsored search listings; (3) creation of a public website that includes key dates and important documents related to this litigation; (4) a chatbot that answers frequently asked questions from potential Class Members and provides additional information about this litigation; and (5) a toll-free telephone number through which potential Class Members can obtain additional information about this litigation.

11. The Class Notice Plan as designed and implemented reached the greatest practicable number of Class Members. The Class Notice Plan’s individual direct email notice efforts resulted in one of the largest, if not the largest email noticing campaign ever implemented for a class action case, with more than 369 million Email Notices sent. This was a massive notice effort. The Email Notices alone were successfully delivered to approximately 93.1% of the Class who were sent an Email Notice, a high percentage of the Class (defined to include both of the Classes certified by the Court). The reach of the individual notice effort was enhanced by a Media Plan that included digital and social media, sponsored search listings, and a case website. Overall, the Class Notice Plan as planned and implemented reached well in excess of 85% of the Class.

12. In my experience, the Class Notice Plan was consistent with other court-approved

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<sup>1</sup> Fed. R. Civ. P. 23(c)(2)(B).

notice plans, was the best notice practicable under the circumstances of this case, and satisfied the requirements of due process, including its “desire to actually inform” requirement.<sup>2</sup>

### **CLASS NOTICE PLAN DETAIL**

13. On January 3, 2024, the Court in the *Order Granting Motion to Certify Class and Denying Daubert Motion* certified the following Classes:

**Class 1:** All individuals who, during the period beginning July 1, 2016 and continuing through the present (the “Class Period”), (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All individuals who, during the Class Period (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

14. Subsequently, on April 5, 2024, in the *Order Granting in Part Motion to “Clarify” Class Definition*, the certified classes under 23(b)(3) for the invasion of privacy and intrusion upon seclusion claims were modified by the Court as follows:

**Class 1:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing through the present (the “Class Period”), (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase

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<sup>2</sup> *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably certain to inform those affected . . .”); *see also In re Hyundai & Kia Fuel Econ. Litig.*, 926 F.3d 539, 567 (9th Cir. 2019) (“To satisfy Rule 23(e)(1), settlement notices must ‘present information about a proposed settlement neutrally, simply, and understandably.’ ‘Notice is satisfactory if it generally describes the terms of the settlement in sufficient detail to alert those with adverse viewpoints to investigate and to come forward and be heard.’”) (citations omitted); N.D. Cal. Procedural Guidance for Class Action Settlements, Preliminary Approval (3) (articulating best practices and procedures for class notice).

Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All “non-Enterprise” and “non-Unicorn” individuals who, during the Class Period (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

15. Additionally, for the CDAFA claim, I understand that the 23(b)(3) classes as certified in the Court’s original class certification order remain the same (i.e., the CDAFA classes under 23(b)(3) include Dasher and Unicorn users). Likewise, the 23(b)(2) classes follow the class definition as set forth in the original class certification order and include Dasher and Unicorn users.

16. On May 31, 2024, the Court in the *Order Granting Plaintiffs’ Motion to Direct Notice to the Certified Classes* approved the Revised Class Notice Plan and appointed Epiq (“Hilsoft Notifications”) as class administrator.

17. After the Court’s *Order Granting Plaintiffs’ Motion to Direct Notice to the Certified Classes* was entered, Epiq began implementing the Class Notice Plan. This declaration details the notice activities undertaken to date and explains how and why the Class Notice Plan was comprehensive and well-suited to reach the Class Members. This declaration also discusses the administration activity to date.

### ***Individual Notice***

18. As detailed in my two prior Notice Plan declarations, it is my understanding from Counsel that in order to create a Google Account, a user must either provide an email address or sign up for a Gmail address. I further understand from Counsel that Google’s records of the email addresses associated with each of the active Google Accounts include email addresses for Gmail or another domain (e.g., AOL, Yahoo, Microsoft, Outlook, and Hotmail). It is my understanding from Counsel that Google also keeps records reflecting the WAA and sWAA settings associated with every active Google Account throughout the Class Period. As a result, the Class Notice Plan provided for sending an Email Notice to the email addresses associated with a Google Account for which the WAA or sWAA setting was turned off or “paused” at any time during the Class Period.

19. Epiq worked with Counsel to facilitate obtaining Class Member data from Google so Epiq could successfully execute the Class Notice Plan Email Notice program. From June 27, 2024, to October 31, 2024, Epiq received approximately 2,700 separate data files containing more than 1 billion records for Google's hundreds of millions of email addresses associated with accounts that had WAA and/or sWAA turned off or "paused" at any time during the Class Period. These records included contact information for Class Members, identifiers for Unicorn and related parent accounts, and duplicate records. After coordinating with counsel for the parties, Epiq conducted considerable data analysis of the more than 1 billion records, deduplicated and rolled-up the records, and loaded the unique, identified Class Member records into its database for this litigation. These efforts resulted in 453,954,525 unique, potential Class Member email records. Epiq used this data to send Email Notices directly to those accounts with a valid email address.

***Individual Notice - Direct Email***

20. Prior to sending Email Notice, multiple email validation and hygiene tools were used to verify and standardize the identified email addresses provided to Epiq and determine whether the email addresses were valid. This is a necessary and critical process for the effectiveness of class action administration email campaigns today as it is common for high numbers of email records to be facially undeliverable or otherwise unattemptable. After these efforts were complete, 369,165,744 valid, email addresses were identified to be sent Email Notice.

21. Commencing on September 23, 2024, Epiq sent 369,165,744 Email Notices to those Class Members with an available valid email address (this includes a separate Email Notice sent to Parents of "Unicorn" Accounts). The following table provides detailed statistics regarding the email noticing campaign and the results.

|                                     | Emails Sent        | Emails Delivered   | Emails Undeliverable | Deliverability |
|-------------------------------------|--------------------|--------------------|----------------------|----------------|
| <b>Email Notice Campaign Totals</b> | <b>369,165,744</b> | <b>343,940,177</b> | <b>25,225,567</b>    | <b>93.1%</b>   |

22. In conducting the email notice efforts, Epiq followed industry standard best practices. The Email Notices were drafted in such a way that the subject line, the sender, and the body of the

1 message overcame SPAM filters and ensured readership to the fullest extent reasonably practicable.  
2 For instance, the Email Notices used an embedded html text format. This format provided easy-to-  
3 read text without graphics, tables, images, attachments, and other elements that increased the  
4 likelihood that the message could be blocked by Internet Service Providers (ISPs) and/or SPAM  
5 filters. Epiq sent the Email Notices from an IP address known to major email providers as one not  
6 used to send bulk “SPAM” or “junk” email blasts. Each Email Notice was transmitted with a digital  
7 signature to the header and content of the Email Notice, which allowed ISPs to programmatically  
8 authenticate that the Email Notices are from authorized mail servers. Each Email Notice was also  
9 transmitted with a unique message identifier.

10 23. The Email Notices included an embedded link to the case website. By clicking the  
11 link, recipients were able to access the Long Form Notice (in English or Spanish) and other  
12 information about the litigation. The Email Notice is attached to this declaration as **Exhibit 1**. The  
13 Email Notice to Parents of “Unicorn” Accounts is attached to this declaration as **Exhibit 2**.

14 24. If an Email Notice was returned as undeliverable, commonly referred to as a “bounce,”  
15 the reason was documented by Epiq. For any Email Notice for which a bounce code was received  
16 indicating that the message was undeliverable, for reasons such as a full recipient mailbox, technical  
17 auto-replies, etc., at least two additional attempts were made to deliver the Notice by email.

#### 18 *Notice Results*

19 25. As of March 20, 2025, an Email Notice was successfully delivered to 343,940,177  
20 identified Class Members who were sent an Email Notice. This means the massive individual noticing  
21 effort delivered an Email Notice to approximately 93.1% of the Class who were sent an Email Notice.  
22 The reach of the individual notice effort was enhanced by a Media Plan that included digital and social  
23 media, sponsored search listings, and a case website. Overall, even taking into account invalid email  
24 records, the Class Notice Plan as planned and implemented reached well in excess of 85% of the Class.

#### 25 *Media Plan Summary*

26 26. The Media Plan included various forms of notice including a digital/internet notice  
27 program (digital notice and social media), and internet sponsored search listings.  
28



***Internet Digital Notice Campaign***

27. Internet advertising has become a standard component in legal notice programs. The internet has proven to be an efficient and cost-effective method to target class members as part of providing notice of a class action case. According to MRI-Simmons data, 100% of adults 18+ in the United States who use Google are online and 90% of adults 18+ in the United States who use Google use social media.<sup>3</sup>

28. The Notice Plan included targeted digital advertising on selected advertising networks and social media sites in various sizes and formats. The Digital Notices were targeted to several custom audiences based on the demographics of the Classes. Digital Notices ran on desktop, mobile, and tablet devices. Digital Notices were also targeted (remarketed) to people who clicked on a Digital Notice. According to MRI-Simmons data, the Target Audience spends an average of 30.4 hours per week on the internet.<sup>4</sup>

29. Digital Notices were placed as targeted digital advertising on selected advertising networks such as *Basis Technologies* and the *Google Display Network*. These advertising networks represent digital properties across all major content categories. Digital Notices were also placed on *Gmail.com*. Digital Notices included targeting in both English and Spanish to selected target audiences. All Digital Notices were designed to encourage engagement by Class Members—by linking directly to the case website, allowing visitors easy access to relevant information and documents, including the Long Form Notice. Consistent with best practices, the Digital Notices used language from the Long Form Notice headline, which allowed users to identify themselves as potential Class Members.

***Social Media Digital Internet Notice Campaign***

30. The Digital Notices were also placed on the leading social media platforms in the United States, including *Facebook*, *Instagram*, *X (Twitter)*, and *Reddit*. The social media campaign used an interest-based approach which focuses on the interests that users exhibit while on the social media platforms, capitalizing on the Target Audience's propensity to engage in social media.

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<sup>3</sup> MRI-Simmons 2024 Survey of the American Consumer®.

<sup>4</sup> MRI-Simmons 2022 Survey of the American Consumer®.



According to MRI-Simmons data, the Target Audience spends an average of 15.49 hours per week on social media.<sup>5</sup>

31. *Facebook* is the leading social networking site in the United States with 60% of all social media usage with 193.8 million users,<sup>6</sup> and *Instagram* has 156 million active users in the United States.<sup>7</sup> The Digital Notices on *Facebook* and *Instagram* were both English and Spanish.

32. *X (Twitter)* is a popular microblogging social media website that allows posts/tweets containing images or videos. Users can like, comment, and share/retweet posts. *X* has more than 106 million users in the United States.<sup>8</sup>

33. *Reddit* is a widely used social forum website that contains more than one million communities known as subreddits. These communities cover specific topics making this an ideal platform to reach individuals with focused interests. *Reddit* has more than 57 million users in the United States.<sup>9</sup>

34. More details regarding the targeting, distribution, and specific ad sizes of the Digital Notices are included in the following table.

| <i>Digital Plan</i>           | <i>Target</i>                          | <i>Language</i>   | <i>Ad Sizes</i>                    | <i>Delivered Impressions</i> |
|-------------------------------|--|-------------------|------------------------------------|------------------------------|
| <i>Basis Ad Network</i>       | A18+                                   | English & Spanish | 728x90, 300x250, 300x600 & 970x250 | 5,353,784                    |
| <i>Google Display Network</i> | Affinity Audience: <sup>10</sup> Gmail | English & Spanish | 728x90, 300x250, 300x600 & 970x250 | 13,200,670                   |
| <i>Google Display Network</i> | Intent Audience: <sup>11</sup> Gmail   | English & Spanish | 728x90, 300x250, 300x600 & 970x250 | 12,964,019                   |
| <i>Google Display Network</i> | Affinity Audience: Google Chrome       | English & Spanish | 728x90, 300x250, 300x600 & 970x250 | 13,152,511                   |

<sup>5</sup> MRI-Simmons 2022 Survey of the American Consumer®.

<sup>6</sup> Statista Digital 2023: Global Overview Report. Statista, founded in 2007, is a leading provider of worldwide market and consumer data and is trusted by thousands of companies around the world for data. Statista.com consolidates statistical data on over 80,000 topics from more than 22,500 sources and makes.

<sup>7</sup> Statista Digital 2023: Global Overview Report.

<sup>8</sup> Statista Digital 2023: Global Overview Report.

<sup>9</sup> Statista Digital 2023: Global Overview Report.

<sup>10</sup> “Custom Affinity Audience” allowed for targeting specific websites, keywords, and/or relevant content the target may have been viewing.

<sup>11</sup> “Custom Intent Audience” allowed for targeting people that were researching or purchasing certain items on the internet.

| <i>Digital Plan</i>           | <i>Target</i>                  | <i>Language</i>   | <i>Ad Sizes</i>                    | <i>Delivered Impressions</i> |
|-------------------------------|--------------------------------|-------------------|------------------------------------|------------------------------|
| <i>Google Display Network</i> | Intent Audience: Google Chrome | English & Spanish | 728x90, 300x250, 300x600 & 970x250 | 12,936,803                   |
| <i>Gmail.com Ads</i>          | Adults 18+                     | English & Spanish | Gmail Promotional Ad               | 26,826,044                   |
| <i>Facebook</i>               | Interest: Gmail                | English & Spanish | Newsfeed & Right Hand Column       | 10,413,010                   |
| <i>Facebook</i>               | Interest: Chrome Browser       | English & Spanish | Newsfeed & Right Hand Column       | 12,902,065                   |
| <i>Facebook</i>               | Interest: Android (OS)         | English & Spanish | Newsfeed & Right Hand Column       | 7,759,262                    |
| <i>Instagram</i>              | Interest: Gmail                | English & Spanish | Newsfeed                           | 6,620,964                    |
| <i>Instagram</i>              | Interest: Chrome Browser       | English & Spanish | Newsfeed                           | 13,024,889                   |
| <i>Instagram</i>              | Interest: Android (OS)         | English & Spanish | Newsfeed                           | 6,523,292                    |
| <i>Reddit</i>                 | /r/Gmail                       | English           | Reddit Feed Ads                    | 5,179,658                    |
| <i>Reddit</i>                 | /r/Chrome                      | English           | Reddit Feed Ads                    | 5,123,258                    |
| <i>Reddit</i>                 | /r/Android                     | English           | Reddit Feed Ads                    | 5,040,339                    |
| <i>X (Twitter)</i>            | Interest: Gmail                | English           | Twitter Feed Ads                   | 5,184,219                    |
| <i>X (Twitter)</i>            | Interest: Chrome Browser       | English           | Twitter Feed Ads                   | 5,231,879                    |
| <i>X (Twitter)</i>            | Interest: Android (OS)         | English           | Twitter Feed Ads                   | 5,058,217                    |
| <i>Yahoo Audience Network</i> | A18+                           | English & Spanish | 728x90, 300x250, 300x600 & 970x250 | 5,714,215                    |
| <b>TOTAL</b>                  |                                |                   |                                    | <b>178,209,098</b>           |

35. Combined, approximately 178.2 million impressions were generated by the Digital Notices nationwide. The internet advertising campaign ran from September 27, 2024, through November 7, 2024. Clicking on the Digital Notices linked the readers to the case website, where they could easily obtain detailed information about the case. Examples of the Digital Notices are attached to this declaration as **Exhibit 3**.

#### ***Sponsored Search Listings***

36. To facilitate locating the case website, sponsored search listings were acquired on the

three most highly-visited internet search engines: *Google*, *Yahoo!*, and *Bing*. When visitors to these search engines searched for selected keyword combinations related to the case, the sponsored search listing advertisement created for this case were displayed. Generally, the sponsored search listing advertisement appeared at the top of the visitor's website page prior to the search results or in the upper right-hand column of the web-browser screen. The sponsored search listings were displayed nationwide. All sponsored search listings linked directly to the case website.

37. The sponsored search listings ran from September 27, 2024, through November 7, 2024. The sponsored listings were displayed 240,837 times, which resulted in 9,867 clicks that displayed the case website. A complete list of the sponsored search keyword combinations is attached to this declaration as **Exhibit 4**. Examples of the sponsored search listing as displayed on each search engine are attached to this declaration as **Exhibit 5**.

#### *Case Website*

38. On September 11, 2024, Epiq established a case website with an easy to remember domain name ([www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com)). The case website contains relevant documents and information including: (i) details regarding the ability to opt-out and the deadline to do so; (ii) the dates and locations of relevant Court proceedings; (iii) the toll-free telephone number for the case; (iv) the Class Notice (Long Form Notice) in English and Spanish; and (v) relevant Court Orders and other filings. In addition, the case website includes answers to frequently asked questions ("FAQs"), contact information for the administrator, and instructions regarding how to obtain other case-related information. The case website address was prominently displayed in all notice documents. The Long Form Notice in English is attached to this declaration as **Exhibit 6**. The Spanish Long Form Notice in English is attached to this declaration as **Exhibit 7**. The content of the FAQs & Answers is attached to this declaration as **Exhibit 8**.

39. The case website also includes chatbot functionality to allow Class Members to easily obtain additional information by submitting questions and receiving approved responses based on the content in the Notices and FAQs. As of March 20, 2025, there have been 450,558 unique visitor sessions to the case website, and 662,342 web pages have been presented.

***Toll-free Telephone Number and Postal Mailing Address***

40. On September 11, 2024, Epiq established a toll-free telephone number (1-855-822-8821) to allow Class Members to call and obtain additional information in English or Spanish. Callers are able to hear an introductory message and have the option to learn more about the case in the form of recorded answers to FAQs. The automated telephone system is available 24 hours per day, 7 days per week. The toll-free telephone number was prominently displayed in all notice documents. As of March 20, 2025, there have been 3,969 calls to the toll-free telephone number representing 9,570 minutes of use.

41. A postal mailing address was established and continues to be available, allowing Class Members the opportunity to request additional information or ask questions.

**PLAIN LANGUAGE NOTICE DESIGN**

42. The Notices were designed to be “noticed,” reviewed, and—by presenting the information in plain language<sup>12</sup>—to be understood by Class Members. The design of the Notices followed the principles embodied in the Federal Judicial Center’s (“FJC”) illustrative “model” notices posted at [www.fjc.gov](http://www.fjc.gov). Many courts, and the FJC itself, have approved notices written by Epiq’s legal notice experts and designed in a similar fashion. The Notices contained substantial, albeit easy-to-read, summaries of all key information about the action and the rights of Class Members including the ability to submit a request to opt-out, and the deadline to do so. Consistent with our normal practice, all notice documents underwent a final edit prior to actual mailing and dissemination for grammatical errors and accuracy.

***Requests for Exclusion***

43. The deadline to request exclusion from the case or to object to the case was February 20, 2025. As of March 20, 2025, Epiq has received 542 requests for exclusion.<sup>13</sup> The Exclusion Report is attached to this declaration as **Exhibit 9**.

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<sup>12</sup> Rule 23(c)(2) of the Federal Rules of Civil Procedure requires class action notices to be written in “plain, easily understood language.”

<sup>13</sup> Each email address that was included in a request for exclusion by a Class Member is considered a separate request for exclusion. Those Class Members who submitted a request for exclusion(s) for one or more email addresses may have additional email addresses for which they did *not* request exclusion.

## CONCLUSION

44. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by federal and/or state statutes, court rules, case law, and the recognized notice standards under the Federal Rules of Civil Procedure Rule 23. This framework directs that a notice plan be optimized to reach the class, and to provide class members with easy access to the details of how the class action may impact their rights. All these requirements were met in this case with the Class Notice Plan.

45. The comprehensive Class Notice Plan included a massive individual noticing effort, which delivered an Email Notice to approximately 93.1% of the hundreds of millions of Class Members who were sent an Email Notice. The reach of the individual notice efforts was enhanced by a Media Plan that included, digital and social media, sponsored search listings, and a case website. Overall, the Class Notice Plan as implemented reached well in excess of 85% of the most expansive definition of the Class.

46. The Federal Judicial Center's ("FJC's") *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*, which is relied upon for federal cases, states that, "the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%."<sup>14</sup> Here, we have developed and implemented a Class Notice Plan that readily achieved a reach well within that standard.


47. The Class Notice Plan followed the guidance for how to satisfy due process obligations that a notice expert gleans from the United States Supreme Court's seminal decisions, which are: a) to endeavor to actually inform the class, and b) to demonstrate that notice is reasonably calculated to do so.

- a) "But when notice is a person's due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it," *Mullane v. Central Hanover Trust*, 339 U.S. 306, 315 (1950).

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<sup>14</sup> FED. JUDICIAL CTR, JUDGES' CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN LANGUAGE GUIDE 3 (2010), available at <https://www.fjc.gov/content/judges-class-action-notice-and-claims-process-checklist-and-plain-language-guide-0>.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 20, 2025.

  
Cameron R. Azari, Esq.

# Exhibit 1



**From:** Google Web App Activity Lawsuit <rodriguezvgoogle@e.epiqnotice.com>  
**To:** [REDACTED]  
**Subject:** Court-Ordered Notice of Class Action

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

**If you have previously had either the Google “Web & App Activity” control or the “Supplemental Web & App Activity” sub-setting turned off or “paused,” you could be included in an ongoing class action lawsuit.**

For more information about the lawsuit, read below or visit  
[www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com).

Para una notificación en Español, visitar [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com).

*A federal Court authorized this Notice. This is not a solicitation from a lawyer.*

**What is the lawsuit about?** Four Google account holders (“Plaintiffs”) filed a class action lawsuit alleging that Google LLC (“Google”) unlawfully accessed their devices and data, including app activity data on their mobile devices, even though the Google activity controls called Web & App Activity (“WAA”) and/or a sub-setting concerning “Chrome history and activity from sites, apps, and devices that use Google services,” sometimes called supplemental Web & App Activity (“sWAA”) were turned off or “paused.” Plaintiffs allege Google unlawfully accessed their mobile devices to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps. Plaintiffs have three legal claims: (1) invasion of privacy; (2) intrusion upon seclusion (similar to invasion of privacy); and (3) violation of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”). For all three legal claims, Plaintiffs seek money damages and changes to Google’s practices.

Google denies Plaintiffs’ legal claims and does not admit any wrongdoing. The Court has not decided who is right.

**You are receiving this Notice because Google’s records indicate that you may be a Class Member.**

The Court decided the legal claims brought by Plaintiffs can proceed as a nationwide class action. You may be included as a Class Member if you have or had WAA and/or sWAA turned off or “paused” at any time between July 1, 2016, and September 23, 2024. This Notice only advises you of the existence of this lawsuit, your rights and options, and the deadlines to exercise them, if you are a Class Member. More specifically, the Court certified the following classes.

## **Comprehensive Computer Data Access and Fraud Act (“CDAFA”)**

For the alleged violation of the CDAFA, the Court certified the following classes:

**Class 1:** All individuals who, during the period beginning July 1, 2016, and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All individuals who, during the period beginning July 1, 2016, and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

## **Invasion of Privacy and Intrusion upon Seclusion**

For the alleged invasion of privacy and intrusion upon seclusion legal claims, the Court certified the same Class 1 and Class 2 but excluded individuals who only have an “Enterprise” account or “supervised Google Account for users under age 13” (also known as a “Unicorn” account). An “Enterprise” account is an account managed by an administrator that is designed for use by end users within an organization, such as businesses, non-profits, and schools. A “supervised Google Account for users under age 13” is an account created for a minor when they are under the age of 13, which is created and supervised by a parent using Google Family Link.

**Class 1:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016, and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

If you are a child for whom a supervised Google Account for users under age 13 was created, please discuss this Notice with your parent or guardian to help you decide whether you may be a Class Member. If you are a parent or guardian supervising a Google Account for users under age 13, and if Google’s records indicate your child may be a Class Member, you will receive a separate Notice. Please review that Notice with your child to help them decide whether they may be a Class Member.

**Is there any money or benefits available now?** No money or benefits are available now. The Court has not decided whether Google did anything wrong, and Plaintiffs and Google have not settled the lawsuit. There is no guarantee money or benefits will be obtained in the future. You will be notified if money or benefits become available.

**What happens if I do nothing at all?** If you do nothing, you will remain a Class Member. If Plaintiffs obtain money or benefits from this lawsuit—as a result of a trial or a settlement—you

may receive a payment or benefits in the future. If you do nothing now, regardless of whether Plaintiffs win or lose, you will be legally bound by all Court orders and judgments regarding the legal claims in this lawsuit. You will lose the right to bring or maintain a separate lawsuit against Google for the legal claims alleged in this lawsuit.

**How do I exclude myself?** To exclude yourself, you must send a written request by mail stating that you want to be excluded from *Rodriguez v. Google LLC*. You must include your name, address, telephone number, email address, and your signature. You must mail your exclusion request **postmarked by February 20, 2025**, to: Rodriguez v. Google Exclusions, P.O. Box 2749, Portland, OR 97208-2749.

You cannot exclude yourself on the phone or by email. To exclude yourself, you must do so individually and separately; no consolidated, group, or mass requests for exclusion will be accepted. If you timely ask to be excluded, you will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) Google in the future regarding the legal claims in this lawsuit. If you do not exclude yourself, by **February 20, 2025**, you will remain a Class Member and be bound by the orders of the Court in this lawsuit.

**Do I have a lawyer in this case?** Yes. The Court has appointed the following lawyers as Class Counsel to represent Class Members. You may also hire your own lawyer at your own expense who may appear on your behalf.

Mark C. Mao  
Beko Reblitz-Richardson  
BOIES SCHILLER FLEXNER LLP  
44 Montgomery St., 41<sup>st</sup> Floor  
San Francisco, CA 94104

John A. Yanchunis  
Ryan J. McGee  
MORGAN & MORGAN  
201 N. Franklin Street, 7<sup>th</sup> Floor  
Tampa, FL 33602

Bill Carmody  
SUSMAN GODFREY LLP  
One Manhattan West  
50<sup>th</sup> Floor  
New York, NY 10001

James Lee  
BOIES SCHILLER FLEXNER LLP  
100 SE 2<sup>nd</sup> St., 28<sup>th</sup> Floor  
Miami, FL 33131

Amanda Bonn  
SUSMAN GODFREY LLP  
1900 Ave. of the Stars, Suite 1400  
Los Angeles, California 90067

**How do I get more information?** This Notice is a summary. Learn more about the lawsuit at [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com) or call 1-855-822-8821.

You may also obtain information regarding the lawsuit on the Court docket in this lawsuit, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS LAWSUIT. ALL QUESTIONS SHOULD BE DIRECTED TO THE NOTICE ADMINISTRATOR OR CLASS COUNSEL.**

If [REDACTED] should not be subscribed or if you need to change your subscription information for Rodriguez v. Google, [please use this preferences page](#).

# Exhibit 2

**From:** Google Web App Activity Lawsuit <rodriguezvgoogle@e.epiqnotice.com>  
**To:** [REDACTED]  
**Subject:** Court-Ordered Notice of Class Action for Supervised Accounts

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

**If your child has or had a supervised Google Account for which either the Google “Web & App Activity” control or the “Supplemental Web & App Activity” sub-setting was turned off or “paused,” your child could be included in an ongoing class action lawsuit.**

For more information about the lawsuit, read below or visit  
[www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com).

Para una notificación en Español, visitar [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com).

*A federal Court authorized this Notice. This is not a solicitation from a lawyer.*

**What is the lawsuit about?** Four Google account holders (“Plaintiffs”) filed a class action lawsuit alleging that Google LLC (“Google”) unlawfully accessed their devices and data, including app activity data on their mobile devices, even though the Google activity controls called Web & App Activity (“WAA”) and/or a sub-setting concerning “Chrome history and activity from sites, apps, and devices that use Google services,” sometimes called supplemental Web & App Activity (“sWAA”) were turned off or “paused.” Plaintiffs allege Google unlawfully accessed their mobile devices to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps. Plaintiffs have three legal claims: (1) invasion of privacy; (2) intrusion upon seclusion (similar to invasion of privacy); and (3) violation of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”). For all three legal claims, Plaintiffs seek money damages and changes to Google’s practices.

Google denies Plaintiffs’ legal claims and does not admit any wrongdoing. The Court has not decided who is right.

**You are receiving this Notice because Google’s records indicate that your child has or had a supervised Google Account and may be a Class Member.** A “supervised Google Account for users under age 13” is an account created for a minor when they are under the age of 13, which is supervised by a parent using Google Family Link.

The Court decided the legal claims brought by Plaintiffs can proceed as a nationwide class action. Your child may be included as a Class Member if their supervised Google Account has or had WAA and/or sWAA turned off or “paused” at any time between July 1, 2016, and September

23, 2024. This Notice only advises you of the existence of this lawsuit, your child's rights and options, and the deadlines to exercise them, if they are a Class Member. More specifically, the Court certified the following classes.

### **Comprehensive Computer Data Access and Fraud Act ("CDAFA")**

For the alleged violation of the CDAFA, the Court certified the following classes:

**Class 1:** All individuals who, during the period beginning July 1, 2016, and continuing through September 23, 2024, (a) had their "Web & App Activity" and/or "supplemental Web & App Activity" setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit ("SDK") and/or Google Mobile Ads SDK.

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### **Invasion of Privacy and Intrusion upon Seclusion**

For the alleged invasion of privacy and intrusion upon seclusion legal claims, the Court certified the same Class 1 and Class 2 but excluded individuals who only have an "Enterprise" account or "supervised Google Account for users under age 13" (also known as a "Unicorn" account). An "Enterprise" account is an account managed by an administrator that is designed for use by end users within an organization, such as businesses, non-profits, and schools. A "supervised Google Account for users under age 13 (or the applicable age in your country)" is an account created for a minor when they are under the age of 13, which is supervised by a parent using Google Family Link. If your child's supervised Google Account was created when they were under the age of 13 and the child is now 13 or older, including being over the age of 18, they may still be a Class Member.

**Class 1:** All "non-Enterprise" and "non-Unicorn" individuals who, during the period beginning July 1, 2016, and continuing through September 23, 2024, (a) had their "Web & App Activity" and/or "supplemental Web & App Activity" setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit ("SDK") and/or Google Mobile Ads SDK.

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If you are a parent or guardian supervising a Google Account for your child and if Google's records indicate that you may be a Class Member in your own right, you will receive a separate Notice.

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**How do I exclude my child?** To exclude your child, you must send a written request by mail stating that you want them to be excluded from *Rodriguez v. Google LLC*. You must include the name of your child, and the address, telephone number, email address associated with your child's supervised Google Account, and your name, telephone number, email address, and signature. You must mail this exclusion request **postmarked by February 20, 2025**, to: Rodriguez v. Google Exclusions, P.O. Box 2749, Portland, OR 97208-2749.

You cannot exclude your child on the phone or by email. To exclude your child, you must do so individually and separately; no consolidated, group, or mass requests for exclusion will be accepted. That means you cannot consolidate your written request to be excluded with your child's request if you are also a Class Member. If you timely ask for your child to be excluded, your child will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) Google on behalf of your child in the future regarding the legal claims in this lawsuit. If you do not exclude your child by **February 20, 2025**, they will remain a Class Member and be bound by the orders of the Court in this lawsuit.

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John A. Yanchunis  
Ryan J. McGee  
MORGAN & MORGAN  
201 N. Franklin Street, 7<sup>th</sup> Floor  
Tampa, FL 33602

Bill Carmody  
SUSMAN GODFREY LLP  
One Manhattan West, 50<sup>th</sup> Floor  
New York, NY 10001

James Lee  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., 28<sup>th</sup> Floor  
Miami, FL 33131

Amanda Bonn  
SUSMAN GODFREY LLP  
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AK637 v.03

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If [REDACTED] should not be subscribed or if you need to change your subscription information for Rodriguez v. Google, [please use this preferences page](#).

# Exhibit 3



# Technology

- Artificial Intelligence
- Cybersecurity
- Space
- Disrupted



## Apple must face narrowed privacy lawsuit over its apps

Legal · September 27, 2024 · 11:50 AM EDT

A federal judge narrowed a lawsuit accusing Apple of violating the privacy of iPhone, iPad and Apple Watch users by collecting their personal data through proprietary apps such as the App Store, Apple Music and Apple TV.



Trump says he will seek Google's prosecution if he wins election

2:35 PM EDT



Boards, Policy & Regulation

EU privacy regulator fines Meta 91 million euros over password storage

7:51 AM EDT



If you have previously had either the Google "Web & App Activity" control or the



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# Technology

Artificial Intelligence

Cybersecurity

Space

Disrupted



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Legal · September 27, 2024 · 11:50 AM EDT

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2:35 PM EDT



"Supplemental Web & App Activity" sub-setting turned off or "paused,"



Boards, Policy &amp; Regulation

### EU privacy regulator fines Meta 91 million euros over password storage

7:51 AM EDT







# Technology

Artificial Intelligence

Cybersecurity

Space

Disrupted



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Cybersecurity



Technology



### Trump says he will seek Google's prosecution if he wins election

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### EU privacy regulator fines Meta 91 million euros over password storage

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Brazil to propose steps to block use of



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MIAMI DOLPHINS

Dolphins could be forced to play without  
linebacker David Long, the team’s leading  
tackler

Miami Dolphins leading tackler David Long Jr. should be shelved for Monday’s game against his former team  
UPDATED SEPTEMBER 27, 2024, 3:45 PM

If you have previously had either the Google “Web & App Activity” control or the “Supplemental Web & App Activity” sub-setting turned off or “paused,” you could be included in an ongoing class action lawsuit.

Learn More

A hand holding a smartphone. The screen displays the text "Web & App Activity".



MIAMI DOLPHINS

What the Dolphins QB coach noticed watching Huntley. And coaches dish on personnel issues  
UPDATED SEPTEMBER 27, 2024, 1:06 PM



FLORIDA PANTHERS

Quick hits on how Panthers lineup is shaping up. And how to watch preseason games  
SEPTEMBER 27, 2024, 12:07 PM



HIGH SCHOOL SPORTS

Results are in. Miami Central’s McQueen voted High School Football Player of the Week  
SEPTEMBER 27, 2024, 11:52 AM



If you have previously had either the Google “Web & App Activity” control or the “Supplemental Web & App Activity” sub-setting turned off or “paused,”



 **NBC NEWS**

LIVE: HELENE

MIDDLE EAST

2024 ELECTION

POLITICS

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# U.S. NEWS

Top stories from around the country.



WEATHER

**Helene ravages the Southeast, killing at least 22 and leaving millions without power**

LIVE

Flash flood emergency in effect for Atlanta as water rescues are underway

WEATHER

Track Helene's path across the U.S.



EXCLUSIVE

**Texas lawmaker vows to ban medical research on unclaimed bodies after NBC News investigation**

As families searched, a Texas medical school cut up their loved ones

Read more on NBC News' series investigating the use of unclaimed bodies for medical research

## LATEST U.S. NEWS



U.S. NEWS

NYC Mayor Adams pleads not guilty to federal corruption charges

## TOP STORIES ON NBC NEWS



NBC NEWS NOW

Helene's devastation stretches from Florida into the Carolinas

## POLITICS NEWS



DONALD TRUMP

Meeting with Zelenskyy, Trump says he will negotiate a Ukraine-Russia deal 'good for both sides'



you could be included in an ongoing class action lawsuit.

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Mike Carlson / AP

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Texas Senate Media Services

EXCLUSIVE

**Texas lawmaker vows to ban medical research on unclaimed bodies after NBC News investigation**

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Read more on NBC News' series investigating the use of unclaimed bodies for medical research

## LATEST U.S. NEWS



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TODAY'S PICKS



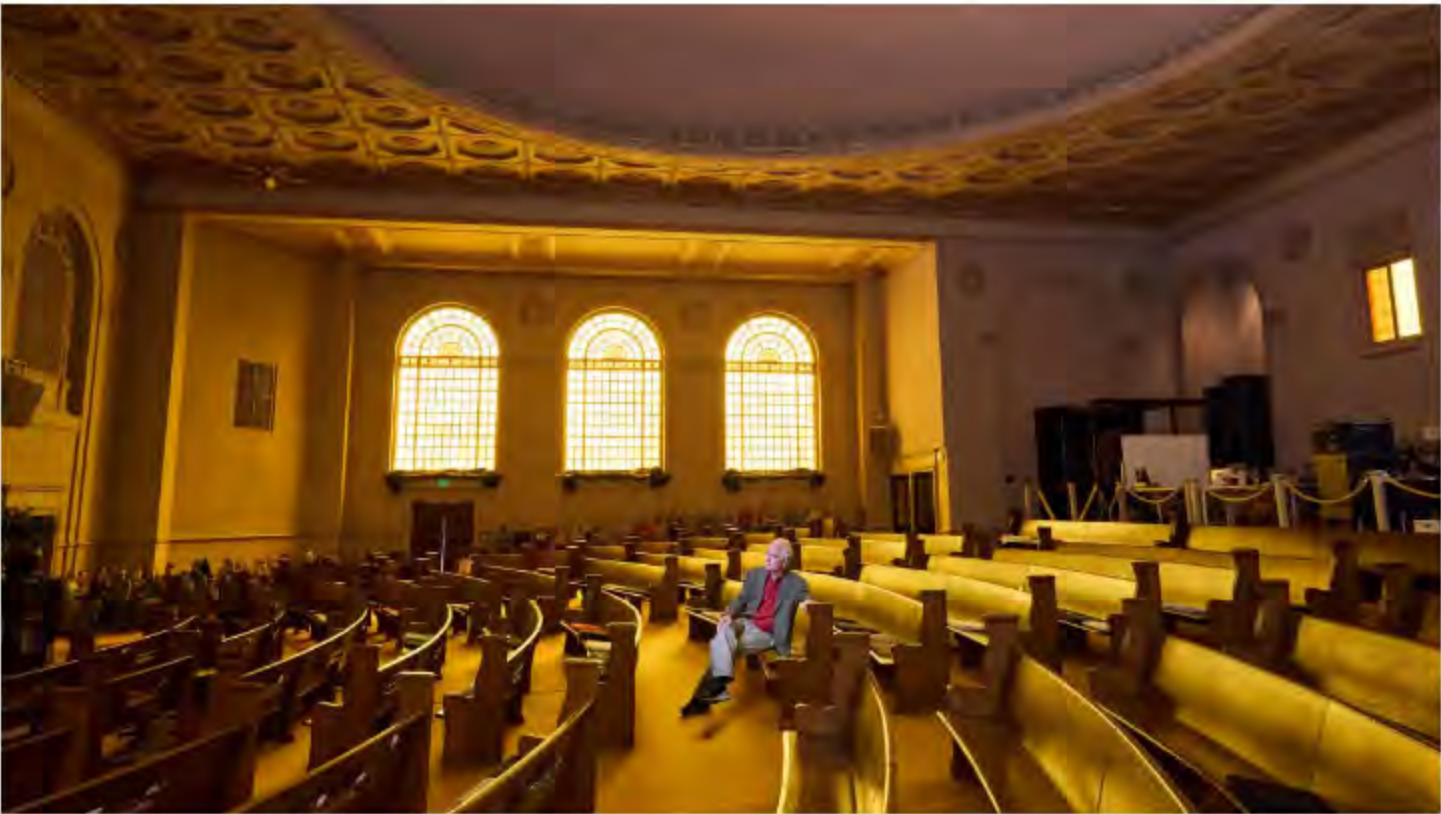
“BEST WATCH EVERRRR”  
Trump’s \$100,000 Watches Are the Most Tragic Celebrity Watch Yet

ALISTAIR CHARLTON



MORE WORK. MORE PAY  
Shein Workers Have Had It—and They’re Going Public

LOUISE MATSAKIS AND JOHANNA COSTIGAN



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KATE KNIBBS

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Solar Sails and Comet Tails: How Sunlight Pushes Stuff Around

RHETT ALLAIN

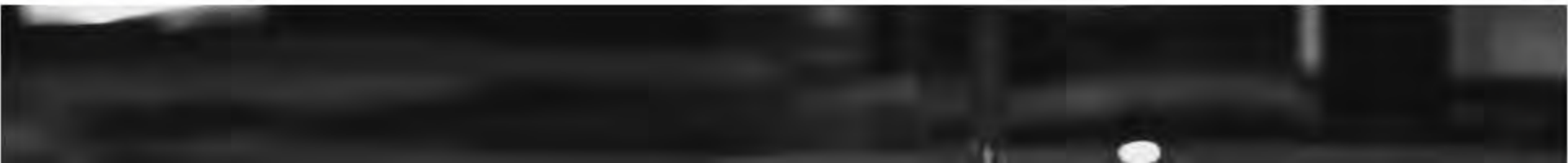


These Are the Best Dyson Vacuums You Can Buy

BRENDA STOLYAR



THE BIG STORY



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## Trae Stephens Has Built AI





## Oura Ring 4 presenta un diseño más delgado, tamaños adicionales y detección mejorada a partir de \$349

Brian Calentador — 3 de octubre de 2024

CRÉDITOS DE LA IMAGEN: NUESTRA

Oura presentó el jueves la cuarta generación de su popular anillo inteligente. El Oura Ring 4 llega poco menos de tres años después del debut de su predecesor. A pesar de la diferencia, el nuevo dispositivo portátil perfecciona en gran medida la experiencia, en lugar de reinventarla.

El cambio de hardware más notable es el perfil más delgado, algo extraño para un dispositivo que ya era extremadamente compacto. La gran diferencia se encuentra en el interior del anillo, ya que los sensores que antes estaban elevados ahora están empotrados, lo que crea una experiencia más consistente y, con suerte, cómoda.

Al igual que [el Oura 3](#), el nuevo anillo está fabricado en titanio, un material ligero y duradero que se ajusta a un peso similar al de un anillo estándar. Está disponible en una gama más amplia de tamaños de anillo, del 4 al 15, y en seis colores diferentes, incluido un "aspecto negro más profundo".

Oura afirma que, a pesar de que los sensores están alejados del dedo, el nuevo anillo recopila datos más precisos que los modelos anteriores. El nuevo modelo contiene un acelerómetro para el movimiento; LED verdes, rojos e infrarrojos para medir la frecuencia cardíaca y respiratoria; y un sensor de temperatura.



Si con anterioridad hubiese hecho que se desactivase o "pausara" el control de "Actividad web y de aplicaciones" de Google o la



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Brían Calentador — 3 de octubre de 2024

CRÉDITOS DE LA IMAGEN: NUESTRA

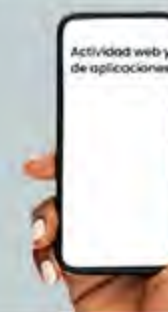
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subconfiguración de "Actividad web y de aplicaciones complementaria",



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es posible que formase parte de una demanda colectiva en curso.

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■ OpenAI también consiguió una



DEPORTES

# Tras reciente lesión, Francia prescinde de Mbappé para Liga de Naciones



El delantero francés Kylian Mbappé (10) pugna el balón con el italiano Samuele Ricci en un partido de la Liga de Naciones de la UEFA, el viernes 6 de septiembre de 2024, en París. (AP Foto/Michel Euler) (Michel Euler / Associated Press)

Por ASSOCIATED PRESS  
Associated Press

Oct. 3, 2024 8:31 AM PT

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PARÍS — Kylian Mbappé fue descartado por Francia para sus próximos partidos de la Liga de Naciones con el fin de que el astro pueda recuperarse plenamente de una leve dolencia muscular.

Aunque Mbappé ingresó en el segundo tiempo de la derrota 1-0 que su Real Madrid sufrió de visita a Lille en la Liga de Campeones el miércoles, el seleccionador francés Didier Deschamps decidió prescindir de sus servicios tras consultar con el capitán.

ANUNCIO

Si con anterioridad hubiese  
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Ago. 4, 2023

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Oct. 2, 2024

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Oct. 2, 2024



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SERÁ CABALLERO NEGOCIO 2 DE OCTUBRE DE 2024 13:59

# Hackear la IA generativa para divertirse y obtener ganancias

El Sundai Club se reúne una vez al mes con el objetivo de superar los límites de la inteligencia artificial generativa. A principios de este año, sus miembros crearon una herramienta muy útil para periodistas.







NEGOCIO 2 DE OCTUBRE DE 2024 13:59

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## Exclusivo: Los navegadores rivales denuncian que las prácticas de Microsoft en Edge son injustas y deberían estar sujetas a las normas tecnológicas de la UE

Juntas directivas, políticas y regulación · 3 de octubre de 2024 · 10:57 a. m. EDT



Inteligencia artificial

**OpenAI obtiene una línea de crédito de 4.000 millones de dólares tras una importante ronda de financiación**

12:11 PM EDT · Actualizado hace una hora



Conocimiento

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6:44 a. m., hora del este de EE. UU.

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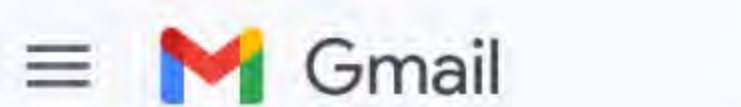
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


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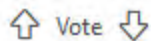
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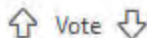


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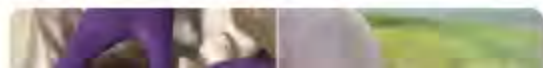


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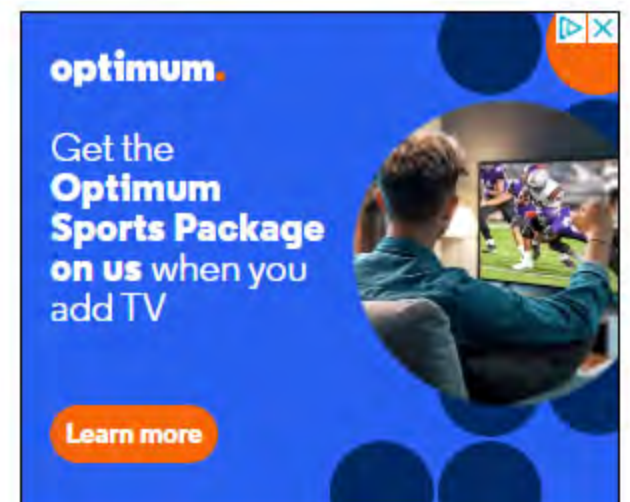
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Google has finally pulled the Wear OS 5 update to Pixel Watch and Pixel Watch 2 customers. The update has caused many of these watches to crash.

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The 39-year-old Vanderpump Rules star arrived to host the DirecTV reality TV celebration in a long black dress that featured see-through, and glitter stripes.

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JD Vance and Donald Trump want to take America backwards. Kamala and I are charting a New Way Forward for all Americans. Donate to Team Harris-Walz before my debate with JD Vance.



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Helene threatens multiple states as a tropical storm; Southwest Airlines confirms new seating policy — and more

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7. Presidents Cup
8. Asheville Flooding
9. Dallas Cowboys
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Floridians ride out Hurricane Helene aboard their boats



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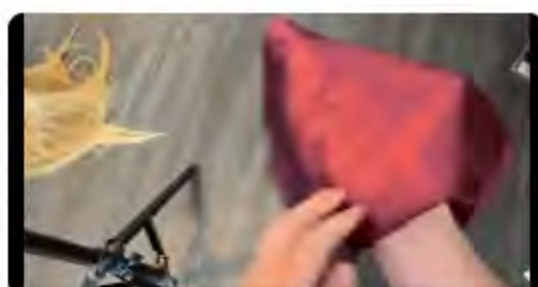


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### How Boy Meets World's Ben Savage Views Maitland Ward's Porn Career

Maitland Ward, who played Rachel McGuire during the final seasons of Boy Meets World, shared how costar Ben Savage supported her amid her porn career in an exclusive E! News...

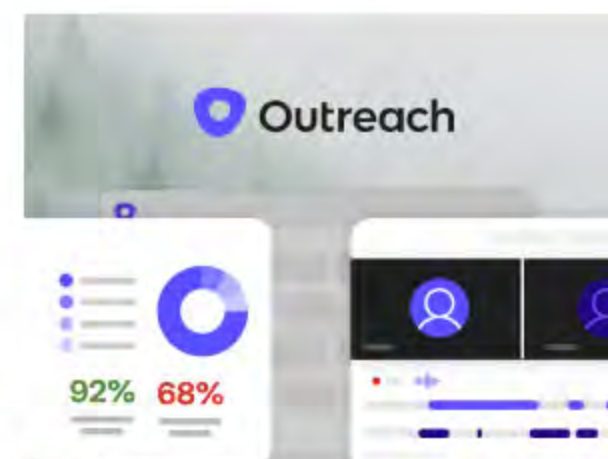
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### Sarah Paulson dice que es hora de que la gente tome a su coprotagonista Kim Kardashian "en serio como actriz"

Sarah Paulson habla sobre su nueva película de terror "Hold Your Breath" y por qué está emocionada de trabajar con Kim Kardashian en el nuevo drama legal de Ryan Murphy.

2 minutos de lectura



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### Interpretar a Damian en 'Chicas pesadas' fue una bendición y una maldición para Daniel Franzese

Daniel Franzese reflexiona sobre el legado inesperado de su personaje y cómo, a veces, lo ha obstaculizado.

5 minutos de lectura



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### Ariana DeBose dice que la fama de 'West Side Story' trajo consigo 'sus propios desafíos': 'No había un manual sobre cómo lidiar con ello o...

La estrella de "House of Spoils", Ariana DeBose, reflexiona sobre su victoria en el Oscar, su vertiginoso 2022 y dice que está bien "decir que no" y "cuidarse".

4 minutos de lectura



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### Kate Winslet recuerda el comentario "estúpido" de un inversor cuando le presentó "Lee": "Me motivó mucho más"

Kate Winslet habla sobre su apasionante proyecto "Lee" y cómo "no se le da muy bien relajarse", diciéndole a Yahoo: "Me desconecto cuando me voy a dormir".

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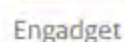
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Asheville se promocionaba como un refugio climático, un lugar para escapar de los peores estragos del clima extremo. Pero [el camino de destrucción mortal](#) del huracán Helene revela que esta ciudad de Carolina del Norte, como cualquier otra en Estados Unidos, nunca estuvo a salvo; es solo que la memoria es corta y el alcance de la crisis climática se subestima constantemente.

“Si vives en un lugar donde puede llover, vives en un lugar donde pueden inundarse”, dijo Kathie Dello, climatóloga estatal de Carolina del Norte. La





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| Google Class Action Lawsuit              | Intrusion Class Action Lawsuit      |
| Google Lawsuit                           | Intrusion Lawsuit                   |
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| Google Web Activity Class Action         | WAA Class Action                    |
| Google Web Activity Class Action Lawsuit | WAA Class Action Lawsuit            |
| Google Web Activity Lawsuit              | WAA Lawsuit                         |
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| Google App Activity Class Action         | sWAA Class Action                   |
| Google App Activity Class Action Lawsuit | sWAA Class Action Lawsuit           |
| Google App Activity Lawsuit              | sWAA Lawsuit                        |
| Web Activity Litigation                  | Google WAA Litigation               |
| Web Activity Class Action                | Google WAA Class Action             |
| Web Activity Class Action Lawsuit        | Google WAA Class Action Lawsuit     |
| Web Activity Lawsuit                     | Google WAA Lawsuit                  |
| App Activity Litigation                  | Google sWAA Litigation              |
| App Activity Class Action                | Google sWAA Class Action            |
| App Activity Class Action Lawsuit        | Google sWAA Class Action Lawsuit    |
| App Activity Lawsuit                     | Google sWAA Lawsuit                 |
| Chrome History Litigation                | CDAFA Litigation                    |
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 Reuters  
<https://www.reuters.com/legal/transactional/google-privacy-lawsuits-pile-up-after-court-denies-class-action/>

Google privacy lawsuits pile up after court denies class action

Jul 17, 2024 — Google privacy lawsuits pile up after court denies class action · Google slams opposing lawyers' \$217 million fee bid in privacy case · Google ...

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Reuters

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## US appeals court revives Google privacy class action

Aug 20, 2024 — The proposed **class** covers **Chrome** users since July 27, 2016 who did not sync their browsers with their **Google** accounts. They said **Google** should ...

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NPR

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## Google to delete search data of millions who used ' ...

Apr 1, 2024 — **Google** will destroy the private browsing **history** of millions of people who used "incognito" mode in its **Chrome** browser as a part of a **settlement** filed to ...



The Verge

<https://www.theverge.com/google-class-action-lawsuit...>

## Google has to face a class action lawsuit over Chrome's ...

Aug 20, 2024 — **Google** will have to face a **class action lawsuit** that accuses it of collecting users' data through **Chrome** without their consent.



Bitdefender

<https://www.bitdefender.com/blog/hotforsecurity>

## Google Agrees to Delete Data Collected from Users ...

A **class action lawsuit** filed against **Google** in 2020 accused the search giant of gathering information from **Google Chrome** users who were browsing the ...



Top Class Actions

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## Google to delete private browsing data as part of Incognito ...

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Author: Max Zahn Video Duration: 2 min

www.cnn.com · 2024/08/05 · business

### Google has an illegal monopoly on search, judge rules. Here's ...

Aug 5, 2024 · Google has violated US antitrust law with its search business, a federal judge ruled

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- google lawsuit claim form
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### Rodriguez v. National Credit Center, LLC, Case No. A-23-869000-B

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The group of people included in the Settlement is called the "Class." You are in the Class if between May 5, 2020 and June 11, 2024, Defendant sold a report to a third party that identified...

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### Rodriguez v. Nat'l Credit Ctr., 2:23-cv-00738-RB-BNW ...

May 3, 2024 · On April 14, 2023, Plaintiff filed his class action Complaint with the District Court, Clark County, Nevada, alleging claims under the Fair Credit Reporting Act, 15 U.S.C. § 1681, et se...

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### Rabelo-Rodriguez et al v. United States Secretary of Homeland ...

Under Rule 23(b)(2), class certification is appropriate if "the party opposing the class has acted or refused to act on grounds that apply generally to the class, so that final injunctive relief or...

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### MAT Asphalt Chicago Settlement — Liddle Sheets P.C. - Class ...

The Court entered the Final Order Approving Class Action Settlement on July 24, 2024 in the matter of Rodriguez vs. MAT Asphalt LLC. (Case No.: 2020-CH-07031). A copy of the Order can ...

www.classaction.org · media · rodriguez-v-just

### BURSOR & FISHER, P.A. - ClassAction.org

Plaintiff seeks relief in this action individually, and as a class action on behalf of similarly situated purchasers of Defendants' products, for: (i) breach of express warranty; (ii) unjust enrichment;...

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### Rodriguez v. Nike Retail Services, Inc., No. 17-16866 (9th ...

Jun 28, 2019 · On December 8, 2014, Rodriguez filed his First Amended Class Action Complaint, which brings claims under: (1) California Labor Code §§ 1194 and 1197 (failure to pay minimum...



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### How to Claim Your Share of Google's \$23 Million Class-Action

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Any US resident who used Google Search and clicked on a search result between Oct. 26, 2006, and Sept. 30, 2013, can file a claim in the settlement.



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A group of Republican-led states have asked a U.S. appeals court to reject a ...

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Republican AGs press Google to pay settlement to victims, not interest group...



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Legal Fee Tracker: Google, privacy lawyers clash over \$217 million fee bid



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# Exhibit 6



UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

**If you have previously had either the Google “Web & App Activity” control or the “Supplemental Web & App Activity” sub-setting turned off or “paused,” you could be included in an ongoing class action lawsuit.**

Para una notificación en Español, visitar [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com).

*A federal Court authorized this Notice. This is not a solicitation from a lawyer.*

Four Google account holders (“Plaintiffs”) filed a class action lawsuit alleging that Google LLC (“Google”) unlawfully accessed their devices and data, including app activity data on their mobile devices, even though the Google activity controls called Web & App Activity (“WAA”) and/or a sub-setting concerning “Chrome history and activity from sites, apps, and devices that use Google services,” sometimes called supplemental Web & App Activity (“sWAA”) were turned off or “paused.” Plaintiffs allege Google unlawfully accessed their mobile devices to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps. Plaintiffs have three legal claims: 1) invasion of privacy; 2) intrusion upon seclusion (similar to invasion of privacy); and 3) violation of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”). For all three legal claims Plaintiffs seek money damages and changes to Google’s practices.

Google denies Plaintiffs’ legal claims and does not admit to any wrongdoing. The Court has not decided who is right.

The Court decided the legal claims brought by Plaintiffs can proceed as a nationwide class action. You may be a Class Member if you have or had WAA and/or sWAA turned off or “paused” at any time between July 1, 2016 and September 23, 2024.

**Comprehensive Computer Data Access and Fraud Act (“CDAFA”)**

For the alleged violation of the CDAFA, the Court certified the following classes:

**Class 1:** All individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

**Invasion of Privacy and Intrusion Upon Seclusion**

For the alleged invasion of privacy and intrusion upon seclusion legal claims, the Court certified the same Class 1 and Class 2 but excluded individuals who only have an “Enterprise” account or “supervised Google Account for users under age 13” (also known as a “Unicorn” account). An “Enterprise” account is an account managed by an administrator that is designed for use by end users within an organization, such as businesses, non-profits, and schools. A “supervised Google Account for users under age 13” is an account created for a minor when they are under the age of 13, which is created and supervised by a parent using Google Family Link.

**Class 1:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google,

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|                           |  |
|---------------------------|--|
| <b>DO NOTHING</b>         | <p><b>Stay in this lawsuit and await the outcome. Lose certain rights.</b></p> <p>This option means you will remain a Class Member and keep the possibility of getting money or benefits that may be available in the future from a trial or settlement. If you choose this option, you will be bound by any judgments in this lawsuit and you will lose any rights to sue Google separately regarding the legal claims in this lawsuit.</p> |
| <b>ASK TO BE EXCLUDED</b> | <p><b>Get no money or benefits from the lawsuit. Keep certain rights.</b></p> <p>If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not receive any. However, you will keep your right to sue Google at your own expense regarding the legal claims in this lawsuit. The deadline to ask to be excluded is <b>February 20, 2025</b>.</p>  |

There is no money available now, and no guarantee there will be in the future. However, your legal rights may be affected, and **you have a choice to make now**.

If you believe you may be a Class Member, **please read this Notice carefully**. The Notice explains the criteria for being considered a Class Member and provides important information about the lawsuit and key dates. You can also go to [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com) for updates.

**BASIC INFORMATION**

**1. What is the lawsuit about?**

Plaintiffs in this lawsuit sued Google alleging that when someone turned off or “paused” Google’s Web & App Activity setting and/or supplemental Web & App Activity setting, Google lacked permission to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps (such as Uber, Venmo, TikTok, Instagram, Facebook, WhatsApp, etc.). Plaintiffs allege that regardless of whether Class Members had these settings paused or turned off, Google collected app activity data using certain code embedded within many non-Google apps. This embedded code includes the Firebase Software Development Kit and the Google Mobile Ads Software Development Kit, which are written and distributed by Google and placed on apps by third party developers who own the apps. Plaintiffs allege Google used this code to unlawfully access their devices and collect, save, and use data from their activity on non-Google apps for Google’s own benefit.

Google denies Plaintiffs’ legal claims. The Court has not decided who is right.



## 2. Why was this Notice issued?

A federal court authorized this Notice because you have a right to know about your legal rights. This Notice only advises you of the existence of this lawsuit, your rights and options, and the deadlines to exercise them, if you are a Class Member.

Chief Judge Richard Seeborg of the United States District Court for the Northern District of California is overseeing this lawsuit, known as *Rodriguez et al. v. Google LLC*, Case No. 20-cv-4688-RS (N.D. Cal.), and has determined that legal claims against Google for invasion of privacy, intrusion upon seclusion, and violation of the California Comprehensive Computer Data Access and Fraud Act, Cal. Penal Code § 502, can proceed as a class action. Judge Seeborg “certified” nationwide Classes and you may be a Class Member.

## 3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives”—in this lawsuit four Class Representatives—sue on behalf of other people who have similar legal claims. All of these people are “Class Members” and together form a “Class” or “Classes.” One court resolves the lawsuit for all class members, except for those who exclude themselves. The Class Representatives who sued—and all the Class Members like them—are called Plaintiffs. The entity they sued (in this lawsuit, Google) is called the defendant.

## 4. Are there any money or benefits available now?

No money or benefits are available now. The Court has not decided whether Google did anything wrong, and Plaintiffs and Google have not settled the lawsuit. There is no guarantee money or benefits will be obtained in the future. You will be notified if money or benefits become available.

# WHO IS A CLASS MEMBER

## 5. Am I part of this class action lawsuit?

You are a Class Member if you meet one or more of the definitions below, as certified by the Court:

### Comprehensive Computer Data Access and Fraud Act (“CDAFA”)

For the alleged violation of the CDAFA, the Court certified the following classes:

Class 1: All individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

Class 2: All individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024 (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

### Invasion of Privacy and Intrusion Upon Seclusion

For the alleged invasion of privacy and intrusion upon seclusion legal claims, the Court certified the same Class 1 and Class 2 but excluded individuals who only have an “Enterprise” account or “supervised Google Account for users under age 13” (also known as a “Unicorn” account). An “Enterprise” account is an account managed by an administrator that is designed for use by end users within an organization, such as businesses, non-profits, and schools. A “supervised Google Account for users under age 13” is an account created for a minor when they are under the age of 13, which is created and supervised by a parent using Google Family Link.

**Class 1:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

Individuals who signed up for an account type other than an Enterprise or supervised Google Account for users under age 13 could be included for all three legal claims. These individuals could be Class Members for both the invasion of privacy and intrusion upon seclusion classes and the CDAFA classes.

If you are a child for whom a supervised Google Account for users under age 13 was created, please discuss this Notice with your parent or guardian to help you decide whether you may be a Class Member. If you are a parent or guardian supervising a Google Account for users under age 13, and if Google’s records indicate your child may be a Class Member, you will receive a separate Notice. Please review that Notice with your child to help them decide whether they may be a Class Member.

It is possible for you to be a Class Member of one or more of these certified classes.

**6. Are Enterprise and supervised Google Accounts for users under age 13 included in the Classes for the legal claims for invasion of privacy and intrusion upon seclusion?**

No. Although these accounts may have been eligible to be included in the Classes certified for these legal claims, the Court later granted Google’s request to exclude Enterprise accounts and supervised Google Accounts for users under age 13 from the invasion of privacy and intrusion upon seclusion Classes. Enterprise and supervised Google Accounts for users under age 13 are still included in the Classes certified for violations of the CDAFA.

The Court has not decided whether individuals with Enterprise accounts or supervised Google Accounts for users under age 13 have valid legal claims for alleged violations for invasion of privacy and intrusion upon seclusion. However, it has determined that those individuals cannot be a part of the existing Classes for the legal claims for alleged violations of invasion of privacy and intrusion upon seclusion. You may hire your own lawyer at your expense if you decide to pursue your own lawsuit.

**7. How do I know if my Web & App Activity and/or supplemental Web & App Activity settings were turned off between July 1, 2016 and September 23, 2024?**

Based on Google’s records, individual Notice is being sent directly to available email addresses for individuals whose Google Web & App Activity and/or supplemental Web & App Activity settings were turned off or “paused” at least once between July 1, 2016 and September 23, 2024.

**8. Are there exceptions to the persons or entities included as Class Members?**

Yes. Certain individuals and entities are excluded from the Classes. These include:

- The Court (including Chief Judge Richard Seeborg, Magistrate Judge Alex G. Tse, jurors in any trial, and their family members);
- Google, its subsidiaries, parents, predecessors, successors and assigns, including any entity in which they have a controlling interest, as well as these entities’ officers, directors, employees, affiliates, and legal representatives;



- People whose legal claims in this matter have already been finally adjudicated on the merits or otherwise released, meaning decided by a court or settled;
- Plaintiffs’ counsel, Class Counsel, and Google’s counsel;
- All persons and entities who submit a timely and valid request to opt out of the lawsuit (Question 11 provides more information on how to do this); and
- The legal representatives, successors, and assigns of any of the above excluded individuals and entities.

#### 9. If I am still not sure if I am a Class Member, who should I contact?

If you’re still not sure whether you are a Class Member, please visit the website, [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com), call the Notice Administrator toll-free at 1-855-822-8821, or write to: Rodriguez v. Google, P.O. Box 2749, Portland, OR 97208-2749.

### **YOUR RIGHTS AND OPTIONS**

You have to decide now whether to remain a Class Member or ask to be excluded.

#### 10. What happens if I do nothing at all?

If you do nothing, you will remain a Class Member. If Plaintiffs obtain money or benefits from this lawsuit—as a result of a trial or a settlement—you may receive a payment or benefits in the future. If you do nothing now, regardless of whether Plaintiffs win or lose, you will be legally bound by all Court orders and judgments regarding the legal claims in this lawsuit. You will lose the right to bring or maintain a separate lawsuit against Google for the legal claims alleged in this lawsuit.

#### 11. What happens if I ask to be excluded?

If you exclude yourself (or “opt out”) from the Class or Classes, you will not receive any money or benefits as a result of a trial or settlement. If you exclude yourself, you will not be legally bound by the Court’s orders and judgments in this lawsuit and you may pursue your own lawsuit against Google for legal claims in this lawsuit. You may hire your own lawyer at your expense if you decide to pursue your own lawsuit. If you exclude yourself so you can start or continue your own lawsuit against Google, you should talk to your own lawyer soon, because your legal claims may be subject to filing deadlines.

#### 12. How do I ask to be excluded?

To exclude yourself, you must send a written request by mail stating that you want to be excluded from *Rodriguez v. Google LLC*. You must include your name, address, telephone number, email address, and your signature. You must mail your exclusion request **postmarked by February 20, 2025**, to:

Rodriguez v. Google Exclusions  
P.O. Box 2749  
Portland, OR 97208-2749

You cannot exclude yourself on the phone or by email. To exclude yourself, you must do so individually and separately; no consolidated, group, or mass requests for exclusion will be accepted.

If you timely ask to be excluded, you will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) Google in the future regarding the legal claims in this lawsuit.

If you do not exclude yourself, by **February 20, 2025**, you will remain a Class Member and be bound by the orders of the Court in this lawsuit.

## **THE LAWYERS REPRESENTING YOU**

### **13. Do I have a lawyer in this lawsuit?**

Yes. The Court has appointed the following lawyers as Class Counsel to represent Class Members. If you have questions, you can reach Class Counsel by sending an email to:

ClassCounsel@GoogleWebAppActivityLawsuit.com

Mark C. Mao  
Beko Reblitz-Richardson  
BOIES SCHILLER FLEXNER LLP  
44 Montgomery St., 41<sup>st</sup> Floor  
San Francisco, CA 94104

John A. Yanchunis  
Ryan J. McGee  
MORGAN & MORGAN  
201 N. Franklin Street, 7<sup>th</sup> Floor  
Tampa, FL 33602

Bill Carmody  
SUSMAN GODFREY LLP  
One Manhattan West  
50th Floor  
New York, NY 10001

James Lee  
BOIES SCHILLER FLEXNER LLP  
100 SE 2<sup>nd</sup> St., 28<sup>th</sup> Floor  
Miami, FL 33131

Amanda Bonn  
SUSMAN GODFREY LLP  
1900 Ave. of the Stars, Suite  
1400  
Los Angeles, California 90067

### **14. How will the lawyers be paid?**

If there is a judgment against Google or a settlement in the future, Class Counsel will ask the Court to approve and award attorneys' fees and expenses. The amount of these attorneys' fees and expenses will ultimately be determined by the Court. You will not have to personally pay the attorneys' fees and expenses. If the Court grants Class Counsel's request, the attorneys' fees and expenses will either be deducted from any money obtained for the Class Members or paid separately by Google.

### **15. Are the Class Representatives paid?**

Class Counsel may ask for service awards for the Class Representatives if there is a judgment or settlement in the future. The service awards would be in addition to Class Representatives' rights as a Class Member to receive a portion of the money or benefit resulting from any such judgment or settlement. The amount of these awards, if any, will ultimately be determined by the Court.

### **16. Should I get my own lawyer?**

You have the right to hire and appear through your own lawyer, but you do not have to do so. Class Counsel is working on behalf of all Class Members as a whole. If you hire your own lawyer, you will have to pay for your lawyer on your own.

### **17. What if I already have my own lawyer?**

If you have already hired your own lawyer, you should contact your lawyer directly with any questions as to whether this Notice applies to you and how to proceed.



## **GETTING MORE INFORMATION**

### **18. Where do I get more information?**

This Notice summarizes the Court's recent decision to certify the lawsuit as a class action. Key dates and important documents related to the lawsuit can be found online at [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com). For additional assistance, please contact the Notice Administrator by calling, toll free, 1-855-822-8821, or writing to: Rodriguez v. Google, P.O. Box 2749, Portland, OR 97208-2749. If you want to communicate with Class Counsel, you may contact them directly. Contact information for Class Counsel is provided in Question 13. You may also hire your own lawyer at your own expense.

You may also obtain information regarding the lawsuit on the Court docket in this lawsuit, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS LAWSUIT. ALL QUESTIONS SHOULD BE DIRECTED TO THE NOTICE ADMINISTRATOR OR CLASS COUNSEL.**

# Exhibit 7



TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS PARA EL DISTRITO NORTE DE CALIFORNIA

**Si anteriormente ha hecho que se desactive o “pause” el control de “Actividad web y de aplicaciones” de Google o la subconfiguración de “Actividad web y de aplicaciones complementaria, es posible que forme parte de una demanda colectiva en curso.**

Para obtener una notificación en español, visite [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com).

*Un tribunal federal autorizó el presente aviso. El presente documento no es una oferta de servicios de un abogado.*

Cuatro titulares de cuentas de Google (“Demandantes”) presentaron una demanda colectiva en la que alegan que Google LLC (“Google”) accedió ilegalmente a sus dispositivos y datos, incluidos los datos de actividad de aplicaciones en sus dispositivos móviles, aunque los controles de actividad de Google llamados Actividad web y de aplicaciones (Web & App Activity, “WAA”) o una subconfiguración relacionada con “Historial de Chrome y actividad de sitios, aplicaciones y dispositivos que utilizan servicios de Google”, a veces llamado Actividad web y de aplicaciones complementaria (supplemental Web & App Activity, “sWAA”) estaban desactivados o “pausados”. Los Demandantes alegan que Google accedió ilegalmente a sus dispositivos móviles para recopilar, guardar y usar los datos relacionados con su actividad en aplicaciones que no son de Google que han incorporado cierto código de software de Google en las aplicaciones. Los Demandantes tienen tres reclamaciones legales: 1) invasión de la privacidad; 2) violación de la intimidad (similar a la invasión de la privacidad); y 3) violación de la Ley Integral de Acceso a Datos Informáticos y Fraude (Comprehensive Computer Data Access and Fraud Act, “CDAFA”). Para todas las tres reclamaciones legales, los Demandantes solicitan indemnización monetaria por daños y perjuicios y cambios en las prácticas de Google.

Google niega las reclamaciones legales de los demandantes y no admite ningún acto ilícito. El Tribunal no ha decidido quién tiene la razón.

El Tribunal decidió que las reclamaciones legales presentadas por los Demandantes pueden procesarse como una demanda colectiva a nivel nacional. Usted puede ser un Miembro del Grupo si tiene o tuvo los controles de WAA o sWAA desactivados o “pausados” en cualquier momento entre el 1 de julio de 2016 y el 23 de septiembre de 2024.

**Ley Integral de Acceso a Datos Informáticos y Fraude (Comprehensive Computer Data Access and Fraud Act, “CDAFA”)**

Por la supuesta violación del CDAFA, el Tribunal certificó los siguientes grupos:

**Grupo 1:** todas las personas que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google (c) desde un dispositivo móvil que ejecuta el sistema operativo de Android, debido al Kit de Desarrollo de Software (Software Development Kit, “SDK”) de Firebase y/o el SDK de anuncios para dispositivos móviles de Google.

**Grupo 2:** todas las personas que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google desde (c) un dispositivo móvil que ejecuta un sistema operativo que no es de Android, debido al SDK de Firebase o al SDK de anuncios para dispositivos móviles de Google.

**Invasión de la privacidad y violación de la intimidad**

¿Tiene alguna pregunta? Visite [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com) o llame al número gratuito 1-855-822-8821

Por las presuntas reclamaciones legales de invasión de la privacidad y violación de la intimidad, el Tribunal certificó el mismo Grupo 1 y Grupo 2, pero excluyó a las personas que solo tienen una cuenta “Enterprise” o una cuenta de Google supervisada para usuarios menores de 13 años (también conocida como cuenta “Unicorn”). Una cuenta “Enterprise” es una cuenta gestionada por un administrador que está diseñada para ser utilizada por usuarios finales dentro de una organización, como empresas, organizaciones sin fines de lucro y escuelas. Una cuenta de Google supervisada para usuarios menores de 13 años es una cuenta creada para un menor cuando éste aún no cumple 13 años de edad, y la supervisa su padre o madre por medio de Google Family Link.

**Grupo 1:** todas las personas “sin cuenta Enterprise” y “sin cuenta Unicorn” que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” y/o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google desde (c) un dispositivo móvil que ejecuta el sistema operativo de Android, debido al Kit de Desarrollo de Software (Software Development Kit, “SDK”) de Firebase y/o al SDK de anuncios para dispositivos móviles de Google.

**Grupo 2:** todas las personas “sin cuenta Enterprise” y “sin cuenta Unicorn” que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google desde (c) un dispositivo móvil que ejecuta un sistema operativo que no es de Android, debido al SDK de Firebase o al SDK de anuncios para dispositivos móviles de Google.

Las personas que se inscribieron en un tipo de cuenta que no sea una cuenta de Enterprise o una cuenta de Google supervisada para usuarios menores de 13 años podrían incluirse en las tres reclamaciones legales. Estas personas podrían ser Miembros del Grupo tanto del grupo de invasión de la privacidad como del grupo de violación de la intimidad y los grupos de CDAFA.

Es posible que usted sea Miembro del Grupo de uno o más de estos grupos certificados.

| SUS OPCIONES Y DERECHOS LEGALES |  |
|---------------------------------|--|
| NO HACER NADA                   | <p><b>Permanece en esta demanda y espera el resultado. Pierde ciertos derechos.</b></p> <p>Esta opción significa que usted seguirá siendo Miembro del Grupo y mantendrá la posibilidad de obtener dinero o beneficios que puedan estar disponibles en el futuro a partir de un juicio o conciliación. Si elige esta opción, tendrá la obligación de cumplir con cualquier sentencia en esta demanda y perderá cualquier derecho a demandar a Google por separado con respecto a las reclamaciones legales en esta demanda.</p> |
| SOLICITAR SER EXCLUIDO          | <p><b>No recibe beneficios o dinero a partir del juicio. Mantiene ciertos derechos.</b></p> <p>Si solicita que se le excluya de esta demanda y posteriormente se dispone que se otorgue dinero o beneficios, usted no recibirá nada. Sin embargo, usted conservará su derecho a demandar a Google por su propia cuenta con respecto a las reclamaciones legales en esta demanda. La fecha límite para solicitar la exclusión es el <b>20 de febrero de 2025</b>.</p>   |

En este momento no hay dinero disponible y no hay garantía de que lo habrá en el futuro. Sin embargo, este caso puede tener incidencia sobre sus derechos legales y **usted tiene que tomar una decisión ahora**.

Si cree que puede ser un Miembro del Grupo, **lea atentamente este Aviso**. El Aviso explica los criterios para ser considerado un Miembro del Grupo y proporciona información importante sobre la demanda y las fechas clave. También puede visitar [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com) para estar al tanto de las actualizaciones.

### **INFORMACIÓN BÁSICA**



**1. ¿De qué trata la demanda?**

Los Demandantes en este caso presentaron una demanda en contra de Google en la que alegan que cuando alguien desactivó o “pausó” la configuración de la Actividad web y de aplicaciones o la configuración de Actividad web y de aplicaciones complementaria, Google carecía de permiso para recopilar, guardar y usar los datos relacionados con su actividad en aplicaciones que no son de Google que han incorporado cierto código de software de Google en las aplicaciones (como Uber, Venmo, TikTok, Instagram, Facebook, WhatsApp, etc.). Los Demandantes alegan que, sin importar si los Miembros del Grupo de demandantes tenían estas configuraciones pausadas o desactivadas, Google recopiló datos de la actividad en la aplicación utilizando cierto código integrado dentro de muchas aplicaciones que no son de Google. Este código integrado incluye el Kit de Desarrollo de Software de Firebase y el Kit de Desarrollo de Software de Anuncios para Dispositivos Móviles de Google, que son escritos y distribuidos por Google y colocados en aplicaciones por desarrolladores externos que son propietarios de las aplicaciones. Los Demandantes alegan que Google utilizó este código para acceder ilegalmente a sus dispositivos y recopilar, guardar y utilizar datos de su actividad en aplicaciones que no son de Google para beneficio propio de Google.

Google niega las reclamaciones legales de los Demandantes. El Tribunal no ha decidido quién tiene la razón.

**2. ¿Por qué se emitió este Aviso?**

Un tribunal federal autorizó este Aviso porque usted tiene derecho a conocer sus derechos legales. Este Aviso solo le informa sobre la existencia de esta demanda, sus derechos y opciones, y los plazos para ejercerlos, si usted es un Miembro del Grupo.

El juez principal Richard Seeborg del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California está supervisando esta demanda, conocida como *Rodriguez et al. v. Google LLC*, caso n.º 20-cv-4688-RS (N.D. Cal.), y ha determinado que las reclamaciones legales contra Google por invasión de la privacidad, violación de la intimidad y violación de la Ley Integral de Acceso a Datos Informáticos y Fraude de California, art. 502 del Cód. Penal de California, puede procesarse como una demanda colectiva. El juez Seeborg “certificó” los Grupos en todo el país y usted puede ser un Miembro del Grupo.

**3. ¿Qué es una demanda colectiva y quiénes participan?**

En una demanda colectiva, una o más personas llamadas los “Representantes del Grupo” (en este caso, cuatro Representantes del Grupo) demandan en nombre de personas que tienen reclamaciones similares. Todas estas personas son “Miembros del Grupo” y en conjunto conforman un “Grupo” o “Grupos”. Un Tribunal resuelve la demanda para todos los Miembros del Grupo, excepto para las personas que se excluyan. Los Representantes del Grupo que presentaron una demanda, y todos los Miembros del Grupo como ellos, se denominan Demandantes. La entidad que demandaron (en esta demanda, Google) se denomina demandado.

**4. ¿Hay algún dinero o beneficios disponibles actualmente?**

No hay dinero ni beneficios disponibles por ahora. El Tribunal no ha decidido si Google hizo algo malo, y los demandantes y Google no han resuelto la demanda. No hay garantía de que se obtengan dinero o beneficios en el futuro. Se le notificará si hay dinero o beneficios disponibles.

**QUIÉNES SON MIEMBROS DEL GRUPO****5. ¿Formo parte de este litigio de Demanda Colectiva?**

Usted es Miembro del Grupo si cumple con una o más de las definiciones indicadas más adelante, según lo define el Tribunal:

## **Ley Integral de Acceso a Datos Informáticos y Fraude (Comprehensive Computer Data Access and Fraud Act, “CDAFA”)**

Por la supuesta violación de la CDAFA, el Tribunal certificó los siguientes grupos:

**Grupo 1:** todas las personas que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” y/o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google desde (c) un dispositivo móvil que ejecuta el sistema operativo de Android, debido al Kit de Desarrollo de Software (Software Development Kit, “SDK”) de Firebase y/o al SDK de anuncios para dispositivos móviles de Google.

**Grupo 2:** todas las personas que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google desde (c) un dispositivo móvil que ejecuta un sistema operativo que no es de Android, debido al SDK de Firebase y/o al SDK de anuncios para dispositivos móviles de Google.

### **Invasión de la privacidad y violación de la intimidad**

Por las presuntas reclamaciones de invasión de la privacidad y violación de la intimidad, el Tribunal certificó los mismos Grupo 1 y Grupo 2, pero excluyó a las personas que solo tienen una cuenta “Enterprise” o una cuenta de Google supervisada para usuarios menores de 13 años (también conocida como una cuenta de “Unicorn”). Una cuenta “Enterprise” es una cuenta gestionada por un administrador que está diseñada para ser utilizada por usuarios finales dentro de una organización, como empresas, organizaciones sin fines de lucro y escuelas. Una “Cuenta de Google supervisada para usuarios menores de 13 años” es una cuenta creada para un menor cuando éste aún no cumple 13 años de edad, que es creada y supervisada por un padre o madre por medio de Google Family Link.

**Grupo 1:** todas las personas “sin cuenta Enterprise” y “sin cuenta Unicorn” que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google desde (c) un dispositivo móvil que ejecuta el sistema operativo de Android, debido al Kit de Desarrollo de Software (Software Development Kit, “SDK”) y/o al SDK de anuncios para dispositivos móviles de Google.

**Grupo 2:** todas las personas “sin cuenta Enterprise” y “sin cuenta Unicorn” que, durante el periodo que comienza el 1 de julio de 2016 y continúa hasta el 23 de septiembre de 2024, (a) tuvieron su configuración de “Actividad web y de aplicaciones” o “Actividad web y de aplicaciones complementaria” desactivada y (b) cuya actividad en una aplicación móvil que no es de la marca Google de todas maneras se transmitió a Google desde (c) un dispositivo móvil que ejecuta un sistema operativo que no es de Android, debido al SDK de Firebase o al SDK de anuncios para dispositivos móviles de Google.

Las personas que se inscribieron en un tipo de cuenta que no sea una cuenta de Enterprise o una cuenta de Google supervisada para usuarios menores de 13 años podrían incluirse en todas las tres reclamaciones legales. Estas personas podrían ser Miembros del Grupo tanto del grupo de invasión de la privacidad como del grupo de violación de la intimidad y los grupos de CDAFA.

Si usted es un niño para el cual se creó una cuenta de Google supervisada para usuarios menores de 13 años, analice este Aviso con su padre/madre o tutor para que le ayude a decidir si puede ser un Miembro del Grupo. Si usted es padre/madre o tutor que supervisa una Cuenta de Google para usuarios menores de 13 años, y si los registros de Google indican que su hijo puede ser Miembro del Grupo, recibirá un Aviso por separado. Revise ese Aviso con su hijo para ayudarlo a decidir si puede ser un Miembro del Grupo.

Es posible que usted sea Miembro del Grupo de uno o más de estos grupos certificados.



**6. ¿Las Cuentas Enterprise y supervisadas de Google para usuarios menores de 13 años están incluidas en los Grupos para las reclamaciones legales de invasión de la privacidad y violación de la intimidad?**

No. Aunque estas cuentas pueden haber sido elegibles para ser incluidas en los Grupos certificados para estas reclamaciones legales, el Tribunal posteriormente otorgó la solicitud de Google de excluir las Cuentas Enterprise y supervisadas de Google para usuarios menores de 13 años de los Grupos de invasión de la privacidad y violación de la intimidad. Las Cuentas Enterprise y supervisadas de Google para usuarios menores de 13 años aún están incluidas en los Grupos certificados por violaciones de la CDAFA.

El Tribunal no ha decidido si las personas con cuentas Enterprise o cuentas de Google supervisadas para usuarios menores de 13 años tienen reclamaciones legales válidas por presuntas violaciones por invasión de la privacidad y violación de la intimidad. Sin embargo, ha determinado que esas personas no pueden formar parte de los Grupos existentes para las reclamaciones legales por presuntas violaciones de invasión de la privacidad y violación de la intimidad. Puede contratar a su propio abogado a su cargo si decide entablar su propia demanda.

**7. ¿Cómo sé si mis configuraciones de Actividad web y de aplicaciones o Actividad web y de aplicaciones complementaria estuvieron desactivadas entre el 1 de julio de 2016 y el 23 de septiembre de 2024?**

En función de los registros de Google, el Aviso individual se envía directamente a los correos electrónicos disponibles de las personas cuyas configuraciones de Actividad web y de aplicaciones o Actividad web y de aplicaciones complementaria de Google se desactivaron o pausaron al menos una vez entre el 1 de julio de 2016 y el 23 de septiembre de 2024.

**8. ¿Existen excepciones a las personas o entidades incluidas como Miembros del Grupo?**

Sí. Las siguientes entidades y personas quedan excluidas de los Grupos: Estas incluyen:

- el Tribunal (incluido el juez principal Richard Seeborg, el juez auxiliar Alex G. Tse, los jurados en cualquier juicio y sus familiares);
- Google, sus subsidiarias, matrices, predecesoras, sucesoras y cesionarias, incluida cualquier entidad en la que tengan una participación mayoritaria, así como los ejecutivos, directores, empleados, filiales y representantes legales de estas entidades;
- personas cuyas reclamaciones legales en este asunto ya se han resuelto de forma definitiva en cuanto al fondo o han sido desestimadas de otro modo, lo cual significa que ya han sido decididas por un tribunal o conciliadas;
- abogados de los Demandantes, Abogados del Grupo y abogados de Google;
- todas las personas y entidades que presenten una solicitud válida y oportuna para retirarse de la demanda (la pregunta 11 proporciona más información sobre cómo hacerlo); y
- los representantes legales, sucesores y cesionarios de cualquiera de las personas y entidades excluidas antes mencionadas.

**9. Si aún no estoy seguro de si soy Miembro del Grupo, ¿con quién debo comunicarme?**

Si aún no está seguro de si es Miembro del Grupo, visite el sitio web, [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com), llame al Administrador del Aviso al número gratuito 1-855-822-8821 o escriba a la dirección Rodríguez v. Google, P.O. Box 2749, Portland, OR 97208-2749.

## **SUS DERECHOS Y OPCIONES**

Tiene que decidir ahora si seguirá siendo Miembro del Grupo o si solicita ser excluido.

**10. ¿Qué sucede si no hago nada?**

Si no hace nada, seguirá siendo Miembro del Grupo. Si los Demandantes obtienen dinero o beneficios de esta demanda, como resultado de un juicio o un acuerdo, es posible que reciba un pago o beneficios en el futuro. Si no hace nada ahora, independientemente de si los Demandantes ganan o pierden, estará legalmente obligado por todas las órdenes y sentencias del Tribunal con respecto a las reclamaciones legales planteadas en esta demanda. Perderá el derecho de entablar o mantener una demanda por separado contra Google por las reclamaciones legales alegadas en esta demanda.

**11. ¿Qué sucede si pido ser excluido?**

Si se excluye (o “retira”) del Grupo o los Grupos, no recibirá dinero ni beneficios como resultado de un juicio o acuerdo. Si se excluye, no tendrá la obligación legal de cumplir las órdenes y sentencias del Tribunal en esta demanda y puede entablar su propia demanda contra Google por las reclamaciones legales planteadas en esta demanda. Puede contratar a su propio abogado a su cargo si decide entablar su propia demanda. Si se excluye para poder iniciar o continuar su propio juicio contra Google, debería hablar con su propio abogado lo antes posible, porque sus reclamaciones podrían estar sujetas a plazos de presentación.

**12. ¿Cómo pido que se me excluya?**

Para excluirse, debe enviar una solicitud por escrito por correo postal que indique que desea ser excluido de *Rodriguez v. Google LLC*. Asegúrese de incluir su nombre, dirección, número de teléfono, correo electrónico y firma. Debe enviar su solicitud de exclusión **por correo con sello postal** a más tardar el **20 de febrero de 2025** a:

Rodriguez v. Google Exclusions  
P.O. Box 2749  
Portland, OR 97208-2749

No puede excluirse por teléfono ni por correo electrónico. Para excluirse, debe hacerlo en forma individual y por separado; no se aceptarán solicitudes de exclusión consolidadas, grupales o masivas.

Si solicita su exclusión en el plazo indicado, no tendrá la obligación legal de cumplir con el resultado de esta demanda. Es posible que pueda demandar (o continuar demandando) a Google en el futuro con respecto a las reclamaciones legales planteadas en esta demanda.

Si no se excluye, a más tardar el **20 de febrero de 2025**, seguirá siendo un Miembro del Grupo y tendrá la obligación de cumplir con las órdenes del Tribunal en esta demanda.

**LOS ABOGADOS QUE LO REPRESENTAN****13. ¿Tengo un abogado en esta demanda?**

Sí. El Tribunal designó a los siguientes abogados como Abogados del Grupo a fin de que representen a los Miembros del Grupo: Si tiene preguntas, puede comunicarse con los Abogados del Grupo enviando un correo electrónico a:

[ClassCounsel@GoogleWebAppActivityLawsuit.com](mailto:ClassCounsel@GoogleWebAppActivityLawsuit.com)

Mark C. Mao  
Beko Reblitz-Richardson  
BOIES SCHILLER FLEXNER LLP  
44 Montgomery St., 41<sup>st</sup> Floor  
San Francisco, CA 94104

John A. Yanchunis  
Ryan J. McGee  
MORGAN & MORGAN  
201 N. Franklin Street, 7<sup>th</sup> Floor  
Tampa, FL 33602

Bill Carmody  
SUSMAN GODFREY LLP  
One Manhattan West  
50th Floor  
New York, NY 10001



James Lee  
BOIES SCHILLER FLEXNER LLP  
100 SE 2<sup>nd</sup> St., 28<sup>th</sup> Floor  
Miami, FL 33131

Amanda Bonn  
SUSMAN GODFREY LLP  
1900 Ave. of the Stars, Suite  
1400  
Los Angeles, California 90067

#### **14. ¿Cómo se pagará a los abogados?**

Si hay una sentencia en contra de Google o una conciliación en el futuro, los Abogados del Grupo solicitarán al Tribunal que apruebe y adjudique los honorarios y gastos de los abogados. El Tribunal determinará en última instancia el monto de los honorarios y los gastos de los abogados que se otorgará. Usted no tendrá que pagar personalmente los honorarios y gastos de los abogados. Si el Tribunal concede la solicitud de los Abogados del Grupo, los honorarios y gastos de los abogados se descontarán del dinero obtenido para los Miembro del Grupo, o Google los pagará por separado.

#### **15. ¿Se remunerará a los Representantes del Grupo por sus servicios?**

Los Abogados del Grupo pueden solicitar compensaciones por servicios para los Representantes del Grupo si hay una sentencia o una conciliación en el futuro. Las compensaciones por servicios se sumarían a los derechos de los Representantes del Grupo como Miembros del Grupo a recibir una parte del dinero o beneficio que resulte de dicha sentencia o conciliación. El monto de estas compensaciones, si las hubiera, será determinado por el Tribunal.

#### **16. ¿Debo contratar a mi propio abogado?**

Usted tiene derecho a contratar y comparecer a través de su propio abogado, pero no tiene que hacerlo. Los Abogados del Grupo trabajan en su nombre como Miembros del Grupo. Si desea tener su propio abogado, tendrá que pagarle usted mismo.

#### **17. ¿Qué sucede si ya tengo mi propio abogado?**

Si ya ha contratado a su propio abogado, debe comunicarse directamente con su abogado si tiene alguna pregunta sobre si este Aviso se aplica a usted y cómo proceder.

### **CÓMO OBTENER MÁS INFORMACIÓN**

#### **18. ¿Dónde obtengo más información?**

Este Aviso resume la reciente decisión del Tribunal de certificar la demanda como una demanda colectiva. Las fechas clave y los documentos importantes relacionados con la demanda se pueden encontrar en línea en [www.GoogleWebAppActivityLawsuit.com](http://www.GoogleWebAppActivityLawsuit.com). Para obtener asistencia adicional, comuníquese con el Administrador del Aviso llamando al número gratuito 1-855-822-8821 o escribiendo a: Rodriguez v. Google, P.O. Box 2749, Portland, OR 97208-2749. Si desea comunicarse con los Abogados del Grupo, puede comunicarse directamente con ellos. La información de contacto de los Abogados del Grupo se proporciona en la pregunta 13. Usted puede contratar a su propio abogado, por su propia cuenta y gasto.

También puede obtener información sobre la demanda en el expediente del Tribunal en esta demanda, por el pago de un cargo, a través del sistema de acceso público a los registros electrónicos del tribunal (Public Access to Court Electronic Records, PACER) en <https://ecf.cand.uscourts.gov>, o visitando la oficina del Secretario del Tribunal del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, entre las 9:00 a. m. y las 4:00 p. m., de lunes a viernes, excepto los feriados del Tribunal.

NO LLAME POR TELÉFONO AL TRIBUNAL O LA OFICINA DEL SECRETARIO DEL TRIBUNAL PARA INFORMARSE ACERCA DE LA PRESENTE CONCILIACIÓN. **TODAS LAS PREGUNTAS DEBEN REMITIRSE AL ADMINISTRADOR DEL AVISO O A LOS ABOGADOS DEL GRUPO.**



# Exhibit 8

## Frequently Asked Questions

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### Basic Information



### **1. What is this lawsuit about?**

Plaintiffs in this lawsuit sued Google alleging that when someone turned off or “paused” Google’s Web & App Activity setting and/or supplemental Web & App Activity setting, Google lacked permission to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps (such as Uber, Venmo, TikTok, Instagram, Facebook, WhatsApp, etc.). Plaintiffs allege that regardless of whether Class Members had these settings paused or turned off, Google collected app activity data using certain code embedded within many non-Google apps. This embedded code includes the Firebase Software Development Kit and the Google Mobile Ads Software Development Kit, which are written and distributed by Google and placed on apps by third party developers who own the apps. Plaintiffs allege Google used this code to unlawfully access their devices and collect, save, and use data from their activity on non-Google apps for Google’s own benefit.

Google denies Plaintiffs’ legal claims. The Court has not decided who is right.

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### **2. Why was the Notice issued?**

A federal court authorized the Notice because Class Members have a right to know about their legal rights. The Notice only advises you of the existence of this lawsuit, your rights and options, and the deadlines to exercise them if you are a Class Member.

Chief Judge Richard Seeborg of the United States District Court for the Northern District of California is overseeing this lawsuit, known as *Rodriguez et al. v. Google LLC*, Case No. 20-cv-4688-RS (N.D. Cal.), and has determined that legal claims against Google for invasion of privacy, intrusion upon seclusion, and violation of the California Comprehensive Computer Data Access and Fraud Act, Cal. Penal Code § 502, can proceed as a class action. Judge Seeborg “certified” two nationwide Classes: Class 1 and Class 2 (together the “Classes”) and you may be a Class Member.

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### **3. What is a class action and who is involved?**

In a class action lawsuit, one or more people called “Class Representatives”—in this lawsuit four Class Representatives—sue on behalf of other people who have similar legal claims. All of these people are “Class Members” and together form a “Class” or “Classes.” One court resolves the lawsuit for all class members, except for those who exclude themselves. The Class Representatives who sued—and all the Class Members like them—are called Plaintiffs. The entity they sued (in this lawsuit, Google) is called the defendant.

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### **4. Are there any money or benefits available now?**

No money or benefits are available now. The Court has not decided whether Google did anything wrong, and Plaintiffs and Google have not settled the lawsuit. There is no guarantee money or benefits will be obtained in the future. You will be notified if money or benefits become available.

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**Who is a Class Member**

**5. Am I part of this class action lawsuit?**

You are a Class Member if you meet one or more of the definitions below, as certified by the Court:

**Comprehensive Computer Data Access and Fraud Act (“CDAFA”)**

For the alleged violation of the CDAFA, the Court certified the following classes:

**Class 1:** All individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024 (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

**Invasion of Privacy and Intrusion Upon Seclusion**

For the alleged invasion of privacy and intrusion upon seclusion legal claims, the Court certified the same Class 1 and Class 2 but **excluded** individuals who only have an “Enterprise” account or “supervised Google Account for users under age 13” (also known as a “Unicorn” account). An “Enterprise” account is an account managed by an administrator that is designed for use by end users within an organization, such as businesses, non-profits, and schools. A “supervised Google Account for users under age 13” is an account created for a minor when they are under the age of 13, which is created and supervised by a parent using Google Family Link.

**Class 1:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

**Class 2:** All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

Individuals who signed up for an account type other than an Enterprise or supervised Google Account for users under age 13 could be included for all three legal claims. These individuals could be Class Members for **both** the invasion of privacy and intrusion upon seclusion classes and the CDAFA classes.



If you are a child for whom a supervised Google Account for users under age 13 was created, please discuss this Notice with your parent or guardian to help you decide whether you may be a Class Member. If you are a parent or guardian supervising a Google Account for users under age 13, and if Google's records indicate your child may be a Class Member, you will receive a separate Notice. Please review that Notice with your child to help them decide whether they may be a Class Member.

It is possible for you to be a Class Member of one or more of these certified classes.

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**6. Are Enterprise and supervised Google Accounts for users under age 13 included in the Classes for the legal claims for invasion of privacy and intrusion upon seclusion?**

No. Although these accounts may have been eligible to be included in the Classes certified for these legal claims, the Court later granted Google's request to exclude Enterprise accounts and supervised Google Accounts for users under age 13 from the invasion of privacy and intrusion upon seclusion Classes. Enterprise and supervised Google Accounts for users under age 13 are still included in the Classes certified for violations of the CDAFA.

The Court has not decided whether individuals with Enterprise accounts or supervised Google Accounts for users under age 13 have valid legal claims for alleged violations for invasion of privacy and intrusion upon seclusion. However, it has determined that those individuals cannot be a part of the existing Classes for the legal claims for alleged violations of invasion of privacy and intrusion upon seclusion. You may hire your own lawyer at your expense if you decide to pursue your own lawsuit.

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**7. How do I know if my Web & App Activity and/or supplemental Web & App Activity settings were turned off between July 1, 2016, and September 23, 2024?**

Based on Google's records, individual Notice is being sent directly to available email addresses for individuals whose Google Web & App Activity and/or supplemental Web & App Activity settings were turned off or "paused" at least once between July 1, 2016, and September 23, 2024.

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**8. Are there exceptions to the persons or entities included as Class Members?**

Yes. Certain individuals and entities are excluded from the Classes. These include:

- The Court (including Chief Judge Richard Seeborg, Magistrate Judge Alex G. Tse, jurors in any trial, and their family members);
- Google, its subsidiaries, parents, predecessors, successors, and assigns, including any entity in which they have a controlling interest, as well as these entities' officers, directors, employees, affiliates, and legal representatives;
- People whose legal claims in this matter have already been finally adjudicated on the merits or otherwise released, meaning decided by a court or settled;

- Plaintiffs' counsel, Class Counsel, and Google's counsel;
- All persons and entities who submit a timely and valid request to opt out of the lawsuit ([FAQ 11](#) provides more information on how to do this); and
- The legal representatives, successors, and assigns of any of the above excluded individuals and entities.

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**9. If I am still not sure if I am a Class Member, who should I contact?**

If you're still not sure whether you are a Class Member, please review this website, call the Notice Administrator toll-free at 1-855-822-8821, or write to: *Rodriguez v Google*, P.O. Box 2749, Portland, OR 97208-2749

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**Your Rights and Options**

**10. What happens if I do nothing at all?**

If you do nothing, you will remain a Class Member. If Plaintiffs obtain money or benefits from this lawsuit—as a result of a trial or a settlement—you may receive a payment or benefits in the future. If you do nothing now, regardless of whether Plaintiffs win or lose, you will be legally bound by all Court orders and judgments regarding the legal claims in this lawsuit. You will lose the right to bring or maintain a separate lawsuit against Google for the legal claims alleged in this lawsuit.

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**Excluding Yourself from the Lawsuit**

**11. What happens if I ask to be excluded?**

If you exclude yourself (or “opt out”) from the Class or Classes, you will not receive any money or benefits as a result of a trial or settlement. If you exclude yourself, you will not be legally bound by the Court's orders and judgments in this lawsuit and you may pursue your own lawsuit against Google for legal claims in this lawsuit. You may hire your own lawyer at your expense if you decide to pursue your own lawsuit. If you exclude yourself so you can start or continue your own lawsuit against Google, you should talk to your own lawyer soon, because your legal claims may be subject to filing deadlines.

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**12. How do I ask to be excluded?**

To exclude yourself, you must send a written request by mail stating that you want to be excluded from *Rodriguez v. Google LLC*. You must include your name, address, telephone number, email address, and your signature. You must mail your exclusion request postmarked by **February 20, 2025**, to:



*Rodriguez v. Google* Exclusions  
P.O. Box 2749  
Portland, OR 97208-2749

You cannot exclude yourself on the phone or by email. To exclude yourself, you must do so individually and separately; no consolidated, group, or mass requests for exclusion will be accepted.

If you timely ask to be excluded, you will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) Google in the future regarding the legal claims in this lawsuit.

If you do not exclude yourself, you will remain a Class Member and be bound by the orders of the Court in this lawsuit.

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### **The Lawyers Representing You**

#### **13. Do I have a lawyer in this lawsuit?**

Yes. The Court has appointed the following lawyers as Class Counsel to represent Class Members. If you have questions, you can reach Class Counsel by calling 1-888-884-5720 or by sending an email to: [ClassCounsel@GoogleWebAppActivityLawsuit.com](mailto:ClassCounsel@GoogleWebAppActivityLawsuit.com).

Mark C. Mao  
Beko Reblitz-Richardson  
BOIES SCHILLER FLEXNER LLP  
44 Montgomery St., 41st Floor  
San Francisco, CA 94104

James Lee  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd St., 28th Floor  
Miami, FL 33131

John A. Yanchunis  
Ryan J. McGee  
MORGAN & MORGAN  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602

Bill Carmody  
SUSMAN GODFREY LLP  
1301 Avenue of the Americas  
32nd Floor  
New York, NY 10019

Amanda Bonn  
SUSMAN GODFREY LLP

1900 Ave. of the Stars, Suite 1400  
Los Angeles, California 90067

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**14. How will the lawyers be paid?**

If there is a judgment against Google or a settlement in the future, Class Counsel will ask the Court to approve and award attorneys' fees and expenses. The amount of these attorneys' fees and expenses will ultimately be determined by the Court. You will not have to personally pay the attorneys' fees and expenses. If the Court grants Class Counsel's request, the attorneys' fees and expenses will either be deducted from any money obtained for the Class Members or paid separately by Google.

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**15. Are the Class Representatives paid?**

Class Counsel may ask for service awards for the Class Representatives if there is a judgment or settlement in the future. The service awards would be in addition to Class Representatives' rights as a Class Member to receive a portion of the money or benefit resulting from any such judgment or settlement. The amount of these awards, if any, will ultimately be determined by the Court.

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**16. Should I get my own lawyer?**

You have the right to hire and appear through your own lawyer, but you do not have to do so. Class Counsel is working on behalf of all Class Members as a whole. If you hire your own lawyer, you will have to pay for your lawyer on your own.

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**17. What if I already have my own lawyer?**

If you have already hired your own lawyer, you should contact your lawyer directly with any questions as to whether this Notice applies to you and how to proceed.

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**Getting More Information**

**18. Where do I get more information?**

This Notice summarizes the Court's recent decision to certify the lawsuit as a class action. Key dates and important documents related to the lawsuit can be found on this website. For additional assistance, please contact the Notice Administrator by calling, toll-free, 1-855-822-8821, or writing to *Rodriguez v Google*, P.O. Box 2749, Portland, OR 97208-2749. If you want to communicate with Class Counsel, you may contact them directly. Contact information for Class Counsel is provided in [FAQ 13](#). You may also hire your own lawyer at your own expense.



You may also obtain information regarding the lawsuit on the Court docket in this lawsuit, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov> or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS LAWSUIT. **ALL QUESTIONS SHOULD BE DIRECTED TO THE NOTICE ADMINISTRATOR OR CLASS COUNSEL.**

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# Exhibit 9





*Rodriguez et al. v. Google LLC*

**Exclusion Report**

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